



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

9/27/2016

Certified Mail

Diane Berniquer
Formica Corporation - Evendale
10155 Reading Road
Cincinnati, OH 45241

Facility ID: 1431150801
Permit Number: P0120131
County: Hamilton

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

Dear Permit Holder:

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

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

and Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

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

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
SWOAQA; Indiana; Kentucky

PUBLIC NOTICE

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

Draft Title V Permit Renewal

Formica Corporation - Evendale

10155 Reading Rd., , Cincinnati, OH 45241

ID#: P0120131

Date of Action: 9/27/2016

Permit Desc: Title V Renewal Permit for a laminate sheet manufacturer, including steam boilers, resin paper coating lines, trimming, and sanding operations..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Bonnie Pray, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-77



Statement of Basis
 Formica Corporation - Evendale
Permit Number: P0120131
Facility ID: 1431150801

Statement of Basis For Air Pollution Title V Permit

Facility ID:	1431150801
Facility Name:	Formica Corporation - Evendale
Facility Description:	Laminate Sheet Manufacturer
Facility Address:	10155 Reading Rd., Cincinnati, OH 45241
Permit #:	P0120131, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input checked="" type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input checked="" type="checkbox"/> Nitrogen Oxides <input checked="" type="checkbox"/> Particulate Matter < 10 microns <input checked="" type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> Title IV	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes. The insignificant emissions units (IEUs) that have applicable state and/or federally-enforceable requirements are included in the terms and conditions in Section B. All other IEUs at this facility are excluded from the requirements to obtain installation or operating permits pursuant to OAC rules 3745-15-05 and 3745-31-03 and have no applicable federally enforceable requirements; therefore, these IEUs are not included in the terms and conditions of this permit pursuant to OAC rule 3745-77-07(A)(13).
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



<p>Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)</p>	<p>N/A</p>
<p>Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)</p>	<p>This permit renewal action incorporates the new federal rule applicability requirements under NESHAP rule Subpart DDDDD as noted in Section B. of the permit terms and in Section C. for each of the affected significant emissions units. Where federal NESHAP rules are applicable (i.e. Subpart DDDDD, Subpart JJJJ), Ohio Air Toxics policy terms and limitations in the underlying PTIs are no longer applicable and have been removed from this permit renewal in accordance with Ohio EPA guidance since the federal rules address the pollutants (HAPs/organics) of concern. This permit renewal also incorporates several PTI administrative modification actions since the prior 2011 Title V issuance which are included by reference (PTI #) in the specific emissions unit terms and conditions for EUs B008-B011, P061, P073, and P074-P077 in Section C. of the permit. These administrative modifications were made to correct rule applicability errors and/or update the BAT determination for Ohio EPA policy in the underlying PTIs (Note that EUs B001-B004 were re-numbered as B008-B011 in this Title V renewal).</p>
<p>Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.</p>	<p>A CAM Plan is required for emissions units P059-P061 and P071-P077 based on potential pre-control device emissions of particulate that are greater than 100 TPY. The particulate emissions and/or control devices employed to reduce particulate emissions are not subject to any NESHAP regulations, therefore CAM is applicable to these sources since the emissions units must comply with an applicable particulate emission limitation under OAC rules.</p> <p>A CAM Plan is also required for emissions unit K014 based on potential pre-control device emissions of VOC that are greater than 100 TPY. The control device employed by K014 to reduce VOC emissions is not subject to any NESHAP regulations since the permittee complies with the HAP limitations of Subpart JJJJ by the use of HAP-compliant coatings, therefore CAM is applicable since emissions unit K014 must comply with the applicable VOC emission limitations, which includes use of a control device, under OAC rule 3745-31-05.</p>

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2.	77-07(A)(13)	N	Listing of insignificant emissions units that are subject to SIP-approved and/or federal regulations.
B.3.	N	40 CFR Part 60	Clarifying and reference term for rule applicability determination regarding emissions units contained in the permit subject to New Source Performance Standards (NSPS).
B.4. – B.6.	N	40 CFR Part 63	Clarifying and reference term for rule applicability determination regarding emissions units contained in the permit subject to National Emission Standards for Hazardous Air Pollutants (NESHAP).



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B.7.	N	40 CFR Part 64	Clarifying term for emissions units that are subject to the CAM rules in 40 CFR Part 64. Emissions units P059-P061 and P071-P077 are subject to CAM based upon the uncontrolled potential to emit for particulate. Emissions unit K014 is subject to CAM based upon the uncontrolled potential to emit for VOC.
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C. Emissions Unit Terms and Conditions

<p>Key:</p> <p>EU = emissions unit ID</p> <p>ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)</p> <p>OR = operational restriction</p> <p>M = monitoring requirements</p> <p>ENF = did noncompliance issues drive the monitoring requirements?</p>	<p>R = record keeping requirements</p> <p>Rp = reporting requirements</p> <p>ET = emission testing requirements (not including compliance method terms)</p> <p>St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement</p> <p>Misc = miscellaneous requirements</p>
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Statement of Basis
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Facility ID: 1431150801

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
B011	0.10 lb/MMBtu and 12.57 TPY PE and PM ₁₀ ; 0.01 lb/MMBtu and 1.25 TPY SO ₂ ; 0.30 lb/MMBtu and 37.7 TPY CO; 0.604 lb/MMBtu and 75.9 TPY NO _x ; 0.039 lb/MMBtu and 4.9 TPY VOC	N	OAC rule 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	Y	N	N	OR: Emissions limitations are based upon the potential to emit for the combustion of wood waste. Permit terms contain operational restriction on the type of fuel combusted to ensure compliance with limitations. Permit terms contain operational restriction on the pressure drop range of the control devices (baghouse) as indicator of compliance with particulate limitations. ET: Since potential emissions less than 5 TPY for SO ₂ and VOC, no emission testing for these pollutants is required during the permit cycle. If the records and reports from operations and/or control device inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance. All requirements for this EU have been transferred from the PTI.
B011	20% opacity, as 6 min avg	17-07(A)	N	N	N	N	N	N	N	Y	N	N	M, R, Rp: Opacity limitation under Subpart DDDDD more stringent. Upon resuming operation of this emissions unit, opacity limitations and associated M, R, Rp for baghouses under Subpart DDDDD sufficient to demonstrate compliance.
B011	Exempt	N	40 CFR 60 Subpart Dc	Y	N	N	N	N	N	N	N	N	ND: The SO ₂ , PE, and opacity limitations in Subpart Dc do not apply because this emissions unit has a maximum heat input rating less than 30 MMBtu/hr and burns only wood.
B011	Table 2 – Emission Limitations for Existing Boilers; Table 3 – Work Practice Standards	N	40 CFR 63 Subpart DDDDD	Y	Y	Y	N	Y	Y	Y	N	N	ND: This emission unit has not operated since the effective date of this rule (January 31, 2013) and the permittee has no plans to resume operation of the emissions unit at this time. Therefore, as set forth in 63.7510(j), the permittee shall complete the initial compliance demonstration and tune-up requirements by the deadlines specified in 63.7510(j) upon re-starting the emissions unit. OR: Permit terms include the operational/work practice requirements specified in the federal rule when the emissions unit resumes operations and becomes subject to the rule.
K003 K004 K005	PE from industrial processes – exempt.	17-11	N	Y	N	N	N	N	N	N	N	N	ND: These emissions units consist of surface coating processes that apply only dip and/or roll coatings, therefore pursuant to OAC rule 3745-17-11(A)(1)(h), these emissions



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EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
K006 K013 K014													units are exempt from the PE limitations specified in this rule.
K003 K004 K005 K006 K013 K014	organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) or more than 20 percent of the mass of coating solids applied (0.20 kg organic HAP per kg coating solid) for each month	N	40 CFR 63 Subpart JJJJ	N	N	Y	N	Y	Y	Y	N	N	ET: Compliance demonstration method is coating analysis and record keeping in accordance with performance test methods specified in federal rule.
K003 K004 K005 K006 K013	VOC content of the coatings employed shall not exceed 0.9 pound of VOC per gallon of coating, as applied, excluding water and exempt solvents.	21-09(PP)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance demonstrated by the permit monitoring and recordkeeping requirements documenting the VOC content of the coatings based upon Method 24 or formulation data.
K013	VOC emissions shall not exceed 234 lbs/hr from coatings	N	OAC rule 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The lb/hr emission limitation represents the potential to emit calculated from the maximum allowable VOC content of the coating in 3745-21-09(PP) and the maximum hourly coating application rate of the emissions unit. Therefore compliance with the VOC coating content above, demonstrated through M, R, Rp, will assure compliance with this limit. All requirements for this EU have been transferred from the PTI.



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		SIP (3745-)	Other										
K013	Emissions from natural gas combustion in the curing oven shall not exceed: 0.012 lb/MMBtu and 0.33 TPY PE/PM ₁₀ ; 0.0006 lb/MMBtu and 0.02 TPY SO ₂ ; 0.021 lb/MMBtu and 0.6 TPY CO; 0.10 lb/MMBtu and 2.8 TPY NO _x ; and 0.0058 lb/MMBtu VOC.	N	OAC rule 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The emission limitations on the curing oven are based on the emissions unit's potential to emit, at the maximum rated heat input capacity, using AP-42 emission factors for natural gas combustion. All requirements for this EU have been transferred from the PTI.
K013	VOC emissions shall not exceed 38.77 TPY, based on a rolling, 12-month summation	N	OAC rule 3745-31-05(D)	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is determined by monitoring, record keeping, and reporting requirements and the applicable VOC coating content restriction in 3745-21-09(PP). All requirements for this EU have been transferred from the PTI.
K013 K014	20% opacity, as 6 min avg	17-07(A)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Combustion of inherently clean fuel (natural gas), therefore no M, R, or Rp required for VEs. Method 9 visible emissions observations may be conducted, if required, to determine compliance under provisions in OAC rule 3745-15-04(A).
K006 K014	VOC emissions from emissions units K006 and K014, combined, shall not exceed 98.9 TPY, based on a rolling, 12-month summation	N	OAC rule 3745-31-05(D) 40 CFR Part 64	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms contain capture and control device efficiency requirements, combined with monitoring, record keeping and reporting, including CAM on K014, to ensure compliance with the emission limitation. All requirements for these EUs have been transferred from the PTI.



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
K014	VOC emissions shall not exceed 11.0 lbs/hr from coatings	N	OAC rule 3745-31-05(A)(3) 40 CFR Part 64	N	N	Y	N	Y	Y	Y	N	N	The lb/hr emission limitation represents the potential to emit calculated from the permittee-supplied VOC emission factor for resins, the control device efficiency, and the maximum hourly coating application rate of the emissions unit. Permit terms contain stack testing requirements and CAM requirements to confirm the resin emission factor and VOC control efficiency. All requirements for this EU have been transferred from the PTI.
K014	VOC emissions shall not exceed 31.5 TPY, based on a rolling, 12-month summation	N	OAC rule 3745-31-05(D) 40 CFR Part 64	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms contain capture and control device efficiency requirements, combined with monitoring, record keeping, reporting, and stack testing, including CAM, to ensure compliance with the emission limitation. All requirements for this EU have been transferred from the PTI.
K014	Emissions from natural gas combustion in the curing oven shall not exceed: 0.0137 lb/MMBtu and 0.9 TPY PE/PM ₁₀ ; 0.0006 lb/MMBtu and 0.04 TPY SO ₂ ; 0.035 lb/MMBtu and 2.3 TPY CO; 0.14 lb/MMBtu and 9.2 TPY NO _x ; and 0.0058 lb/MMBtu VOC.	N	OAC rule 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The emission limitations on the curing oven are based on the emissions unit's potential to emit, at the maximum rated heat input capacity, using AP-42 emission factors for natural gas combustion. All requirements for this EU have been transferred from the PTI.
K014	Emissions from natural gas combustion in the oxidizer shall not exceed: 0.012 lb/MMBtu and 0.09 TPY	N	OAC rule 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The emission limitations on the oxidizer are based on the emissions unit's potential to emit, at the maximum rated heat input capacity, using AP-42 emission factors for natural gas combustion. All requirements for this EU have been transferred from the PTI.



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EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	PE/PM ₁₀ ; 0.0006 lb/MMBtu and 0.004 TPY SO ₂ ; 0.021 lb/MMBtu and 0.16 TPY CO; 0.10 lb/MMBtu and 0.75 TPY NO _x ; and 0.0058 lb/MMBtu VOC.												
P059 P060 P061 P071 P072 P073 P074 P075 P076 P077	20% opacity, as 6 min avg	17-07(A)	N	N	N	Y	N	Y	Y	N	N	N	ET: M, R, Rp terms require daily control device (baghouse and/or cyclone) inspections as indicator of compliance or potential noncompliance with the visible emission opacity limitation. If the records and reports from the control device inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the opacity limitations in accordance with Method 9 procedures.
P059 P074 P076	PE shall not exceed 9.51 lbs/hr	17-11(B)(1)	40 CFR Part 64	N	N	Y	N	Y	Y	N	N	N	ET: This particulate limitation is greater than the controlled potential to emit as described in the Testing terms of the permit. These emissions units are subject to CAM to assure compliance with applicable particulate limitations. M, R, Rp terms require daily control device (baghouse) inspections as indicator of compliance or potential noncompliance with the particulate limitation. If the records and reports from the control device inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the particulate limitation in accordance with US EPA-approved test methods.
P060 P072	1.2 lbs PE/hr and 0.9 lb PM ₁₀ /hr from P060 and P072, combined. 5.27 TPY PE and 3.94 TPY PM ₁₀	N	OAC rule 3745-31-05(A)(3) 40 CFR	N	N	Y	N	Y	Y	N	N	N	ET: The PE/PM ₁₀ limitations reflect the controlled potential to emit for emissions units P060 and P072, combined, as described in the Testing terms of the permit. These emissions units are subject to CAM to assure compliance with applicable particulate limitations. M, R, Rp terms require daily control device (baghouse and/or cyclone) inspections as indicator of



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EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	from P060 and P072, combined.		Part 64										<p>compliance or potential noncompliance with the particulate limitation. If the records and reports from the control device inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the particulate limitations in accordance with US EPA-approved test methods.</p> <p>All requirements for these EUs have been transferred from the PTI.</p>
P061	Cyclone control device with design control efficiency of at least 99% for PE.	N	OAC rule 3745-31-05(A)(3) ORC 3704.03(T)	N	N	N	N	N	N	N	N	N	<p>M, R, Rp, ET: No ongoing M, R, Rp, ET required for BAT design specification demonstration pursuant to Ohio EPA SB265 BAT guidance for sources >10 TPY.</p> <p>All requirements for this EU have been transferred from the PTI.</p>
P061	PM ₁₀ shall not exceed 0.10 ton/month avg over a 12-month rolling period	N	OAC rule 3745-31-05(A)(3) 40 CFR Part 64	N	Y	Y	N	Y	Y	N	N	N	<p>OR: Permit terms contain restriction on maximum production throughput per year to demonstrate compliance with emission limitations.</p> <p>ET: The PM₁₀ limitation reflects the controlled potential to emit as described in the Testing terms of the permit, based on the federally enforceable maximum annual production restriction. Compliance is determined by monitoring, record keeping, and reporting requirements in the permit. This emissions unit is also subject to CAM to assure compliance with applicable particulate limitations. M, R, Rp terms require daily control device (baghouse and/or cyclone) inspections as indicator of compliance or potential noncompliance with the particulate limitation.</p> <p>All requirements for this EU have been transferred from the PTI.</p>
P061 P073	Total PE shall not exceed 23.72 TPY from P061 and P073, combined, as a	N	OAC rule 3745-31-05(D) 40 CFR	N	Y	Y	N	Y	Y	N	N	N	<p>OR: Permit terms contain restriction on maximum production throughput per year to demonstrate compliance with emission limitations.</p> <p>ET: The PE limitation reflects the controlled potential to emit as</p>



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EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	12-month rolling summation.		Part 64										described in the Testing terms of the permit, based on the federally enforceable maximum annual production restrictions on P061 and P073. Compliance is determined by monitoring, record keeping, and reporting requirements in the permit. These emissions units are also subject to CAM to assure compliance with applicable particulate limitations. M, R, Rp terms require daily control device (baghouse and/or cyclone) inspections as indicator of compliance or potential noncompliance with the particulate limitation. All requirements for these EUs have been transferred from the PTI.
P071 P075 P077	PE shall not exceed 9.01 lbs/hr	17-11(B)(1)	40 CFR Part 64	N	N	Y	N	Y	Y	N	N	N	ET: This particulate limitation is greater than the controlled potential to emit as described in the Testing terms of the permit. These emissions units are subject to CAM to assure compliance with applicable particulate limitations. M, R, Rp terms require daily control device (baghouse and/or cyclone) inspections as indicator of compliance or potential noncompliance with the particulate limitation. If the records and reports from the control device inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the particulate limitation in accordance with US EPA-approved test methods.
P073	Cyclone and baghouse control devices with design control efficiency of at least 99% and 99.8%, respectively, for PE.	N	OAC rule 3745-31-05(A)(3) ORC 3704.03(T)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: No ongoing M, R, Rp, ET required for BAT design specification demonstration pursuant to Ohio EPA SB265 BAT guidance for sources >10 TPY. All requirements for this EU have been transferred from the PTI.
P073	PM ₁₀ shall not exceed 0.004 ton/month avg over a 12-month rolling period	N	OAC rule 3745-31-05(A)(3) 40 CFR	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on maximum production throughput per year to demonstrate compliance with emission limitations. ET: The PM ₁₀ limitation reflects the controlled potential to emit



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
			Part 64										<p>as described in the Testing terms of the permit, based on the federally enforceable maximum annual production restriction. Compliance is determined by monitoring, record keeping, and reporting requirements in the permit. This emissions unit is also subject to CAM to assure compliance with applicable particulate limitations. M, R, Rp terms require daily control device (baghouse and/or cyclone) inspections as indicator of compliance or potential noncompliance with the particulate limitation.</p> <p>All requirements for this EU have been transferred from the PTI.</p>
B008 B009 B010	When burning natural gas: 0.008 lb/MMBtu PE; 0.008 lb/MMBtu PM ₁₀ ; 0.0006 lb/MMBtu SO ₂ ; 0.05 lb/MMBtu NO _x ; 0.08 lb/MMBtu CO; and 0.005 lb/MMBtu VOC	N	OAC rule 3745-31-05(A)(3)	N	N	Y	N	N	N	N	N	N	<p>OR: In accordance with underlying PTI, permit contains restriction requiring use of low NO_x burner.</p> <p>M, R, Rp, ET: The emission limitations reflects the emissions unit's potential to emit at the maximum rated capacity, using AP-42 emission factors, therefore no monitoring, record keeping or reporting is required. Emission testing was conducted for NO_x and CO after installation which demonstrated compliance with the lb/MMBtu limitations. Based on the results of those tests and the actual annual emission rate of the units, subsequent testing or testing for other pollutants is not specifically required pursuant to Engineering Guide #16, however, under OAC rule 3745-15-04, subsequent stack emissions testing will be conducted, if required, using EPA-approved methods.</p> <p>All requirements for these EUs have been transferred from the PTI.</p>
B008 B009 B010	When burning fuel oil: 0.15 lb/MMBtu NO _x ; 0.04 lb/MMBtu CO; and 0.002 lb/MMBtu VOC	N	OAC rule 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	<p>M, R, Rp, ET: The emission limitations reflects the emissions unit's potential to emit at the maximum rated capacity, using AP-42 emission factors, therefore no monitoring, record keeping or reporting is required. Emission testing was conducted for NO_x and CO after installation which demonstrated compliance with the lb/MMBtu limitations. Based on the results of those tests and the actual annual emission rate of the units, subsequent testing or testing for other</p>



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EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													pollutants is not specifically required pursuant to Engineering Guide #16, however, under OAC rule 3745-15-04, subsequent stack emissions testing will be conducted, if required, using EPA-approved methods. All requirements for these EUs have been transferred from the PTI.
B008 B009 B010	When burning fuel oil: 0.328 lb/MMBtu SO ₂	N	OAC rule 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restrictions on fuel oil specifications to demonstrate compliance with emission limitation. ET: Compliance is determined by monitoring, record keeping, and reporting requirements, including fuel oil sampling. All requirements for these EUs have been transferred from the PTI.
B008 B009 B010	SO ₂ shall not exceed 38.7 TPY for emissions units B008, B009, and B010, combined, as a rolling 12-month summation	N	OAC rule 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restrictions on type of fuel used and maximum fuel oil usage per year to demonstrate compliance with emission limitations. ET: Compliance is determined by monitoring, record keeping, and reporting requirements, fuel oil sampling, and the emission factors found in AP-42. All requirements for these EUs have been transferred from the PTI.
B008 B009 B010	NO _x shall not exceed 66.2 TPY for emissions units B008, B009, and B010, combined, as a rolling 12-month summation	N	OAC rule 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restrictions on use of low NO _x burners, type of fuel used, and maximum fuel oil usage per year to demonstrate compliance with emission limitations. ET: Compliance is determined by monitoring, record keeping, and reporting requirements and the emission factors found in AP-42. All requirements for these EUs have been transferred from the PTI.



Statement of Basis
 Formica Corporation - Evendale
Permit Number: P0120131
Facility ID: 1431150801

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
B008 B009 B010	PE shall not exceed 0.02 lb/MMBtu when burning fuel oil	17-10(B)(1)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The emission limitation reflects the emissions unit's potential to emit at the maximum rated capacity, using AP-42 emission factors for fuel oil combustion. If required, stack emissions testing will be conducted using EPA-approved methods.
B008 B009 B010	20% opacity as a 6-minute average, except for one 6-minute period of not more than 27% opacity.	N	40 CFR Part 60, Subpart Dc	N	N	Y	N	Y	Y	Y	N	N	
B008 B009 B010	Table 3 – Work Practice Standards	N	40 CFR 63 Subpart DDDDD	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms include the operational/work practice requirements specified in the federal rule. ET: Federal rule contains no emission testing requirements for boilers in the Gas 1 fuels subcategory.
P075 P077	PE shall not exceed 0.01 lb/hr and 0.05 TPY; PM ₁₀ shall not exceed 0.003 lb/hr and 0.01 TPY	N	OAC rule 3745-31-05(A)(3) OAC rule 3745-31-05(C) 40 CFR Part 64	N	Y	Y	N	Y	Y	N	N	N	OR: Use of cyclone and baghouse with minimum control efficiency of 99% and 99.8% respectively. ET: The PE/PM ₁₀ limitations reflect the controlled potential to emit for each emissions unit as described in the Testing terms of the permit. These emissions units are subject to CAM to assure compliance with applicable particulate limitations. M, R, Rp terms require daily control device (baghouse and/or cyclone) inspections as indicator of compliance or potential noncompliance with the particulate limitations. If the records and reports from the control device inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the particulate limitations in accordance with US EPA-approved test methods. All requirements for these EUs have been transferred from the PTI.
P074	PE shall not	N	OAC rule	N	Y	Y	N	Y	Y	N	N	N	OR: Use of cyclone with minimum control efficiency of 99%.



Statement of Basis
 Formica Corporation - Evendale
Permit Number: P0120131
Facility ID: 1431150801

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P076	exceed 5.41 lbs/hr and 23.69 TPY; PM ₁₀ shall not exceed 0.27 lb/hr and 1.18 TPY		3745-31-05(A)(3) OAC rule 3745-31-05(C) 40 CFR Part 64										<p>ET: The PE/PM₁₀ limitations reflect the controlled potential to emit for each emissions unit as described in the Testing terms of the permit. These emissions unit are subject to CAM to assure compliance with applicable particulate limitations. M, R, Rp terms require daily control device (baghouse and/or cyclone) inspections as indicator of compliance or potential noncompliance with the particulate limitations. If the records and reports from the control device inspections indicate potential noncompliance, then testing would be required under OAC rule 3745-15-04(A) to demonstrate compliance with the particulate limitations in accordance with US EPA-approved test methods.</p> <p>All requirements for these EUs have been transferred from the PTI.</p>



DRAFT

**Division of Air Pollution Control
Title V Permit
for
Formica Corporation - Evendale**

Facility ID:	1431150801
Permit Number:	P0120131
Permit Type:	Renewal
Issued:	9/27/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Formica Corporation - Evendale

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Draft Title V Permit
Formica Corporation - Evendale
Permit Number: P0120131
Facility ID: 1431150801

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1431150801
Facility Description: Laminate Sheet Manufacturer
Application Number(s): A0054968
Permit Number: P0120131
Permit Description: Title V Renewal Permit for a laminate sheet manufacturer, including steam boilers, resin paper coating lines, trimming, and sanding operations.
Permit Type: Renewal
Issue Date: 9/27/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0099308

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

Formica Corporation - Evendale
10155 Reading Rd.
Cincinnati, OH 45241

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

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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 Southwest Ohio Air Quality Agency. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Title V Permit
Formica Corporation - Evendale
Permit Number: P0120131
Facility ID: 1431150801
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Southwest Ohio Air Quality Agency. 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (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 Southwest Ohio Air Quality Agency) 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency.
- 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 Southwest Ohio Air Quality Agency. 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency must be notified in writing of any transfer of this permit.

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

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

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

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

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



30. Submitting Documents Required by this Permit

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



Draft Title V Permit
Formica Corporation - Evendale
Permit Number: P0120131
Facility ID: 1431150801
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

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

P078 Emergency Generator #1 [PBR15150]

P079 Emergency Generator #2 [PBR15150]

P103 Emergency Generator #3 [PBR15150]

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

3. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subparts A and Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (NSPS): B008, B009, B010, and B011. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

(Authority for term: 40 CFR Part 60)

4. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts A and JJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Paper and Other Web Coating Industry: K003, K004, K005, K006, K013, and K014. The complete NESHAP requirements, including the NESHAP General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart JJJJ. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart JJJJ.

(Authority for term: 40 CFR Part 63)

5. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts A and DDDDD, National Emission Standards for Hazardous Air Pollutants (NESHAP) Industrial, Commercial, and Institutional Boilers and Process Heaters: B008, B009, B010, and B011.

The complete NESHAP requirements, including the NESHAP General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

(Authority for term: 40 CFR Part 63)

6. The following insignificant emissions units contained in this permit are subject to 40 CFR Part 63, Subparts A and ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines: P078, P079, and P103. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

(Authority for term: 40 CFR Part 63)

7. The Southwest Ohio Air Quality Agency has approved the Compliance Assurance Monitoring (CAM) plan, dated 9/21/2010, prepared and submitted by the permittee pursuant to 40 CFR Part 64, for emissions units K014, P059, P060, P061, P071, P072, P073, P074, P075, P076, and P077. The permittee shall comply with the provisions of the plan (as specified in Part C - Terms and Conditions for Emissions Units) during any operation of the aforementioned emissions units.

(Authority for term: 40 CFR Part 64)

8. The following abbreviations are used throughout this permit:

PE = Particulate emissions as measured by the applicable test methods in 40 CFR Part 60, Appendix A, "Standards of Performance for New Stationary Sources"

PM₁₀ = Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers as measured either by a reference method that is based on 40 CFR Part 50, Appendix J and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53

SO₂ = Sulfur dioxide

NO_x = Nitrogen oxides

CO = Carbon Monoxide

VOC = Volatile organic compounds

HAP = Hazardous air pollutant

TPY = Ton(s) per year

MMBtu = million British thermal units

PTI = Permit to Install

CFR = Code of Federal Regulations

OAC = Ohio Administrative Code

ORC = Ohio Revised Code

kg = kilograms



Draft Title V Permit
Formica Corporation - Evendale
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ug = micrograms

lb = pound



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C. Emissions Unit Terms and Conditions



1. B011, Boiler DSI-4

Operations, Property and/or Equipment Description:

28.7 MMBtu/hour wood waste-fired boiler #4 with multiclone and baghouse (previously B004, under PN 1431154026)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #P0119135, issued 7/17/2015)	PE and PM ₁₀ emissions shall not exceed 0.10 lb/MMBtu* and 12.57 TPY*. SO ₂ emissions shall not exceed 0.01 lb/MMBtu* and 1.25 TPY*. CO emissions shall not exceed 0.30 lb/MMBtu* and 37.7 TPY*. NO _x emissions shall not exceed 0.604 lb/MMBtu* and 75.9 TPY*. VOC emissions shall not exceed 0.039 lb/MMBtu* and 4.9 TPY*. The PE limitations established pursuant to OAC rule 3745-31-05(A)(3) when combusting wood waste are less stringent than the emission limitations established pursuant to 40 CFR Part 63, Subpart DDDDD. The permittee shall comply with all applicable emission limitations (including any less stringent emission limitation) after the compliance date in 40 CFR Part 63, Subpart DDDDD. See b)(2)a., c)(1), and c)(2).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>*The lb/MMBtu and TPY emission limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these emission limits.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and 40 CFR Part 60 Subpart Dc.</p>
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(C)	The PE limitation specified in OAC rule 3745-17-10(C) is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 60, Subpart Dc	<p>The SO₂, PE, and visible emission limitations specified in 40 CFR Part 60, Subpart Dc, do not apply because this emissions unit has a maximum rated heat input capacity of less than 30 MMBtu/hour and is restricted to burning only wood.</p> <p>See b)(2)b.</p>
e.	<p>40 CFR Part 63, Subpart DDDDD (40 CFR Part 63.7480-7575)</p> <p>National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters</p> <p>[In accordance with 40 CFR 63.7490, 63.7499, and 63.7575, this emissions unit is an existing unit that commenced construction prior to 6/4/2010 (installation commenced 9/1/1999), designed to burn biomass/bio-based solid/solid fuel as</p>	<p>Applicable Emission Limits in Table 2**; Work Practice Standards in Table 3**; and Operating Limits in Table 4** to Subpart DDDDD of 40 CFR Part 63.</p> <p>**This emission unit has not operated since the effective date of this rule (January 31, 2013) and the permittee has no plans to resume operation of the emissions unit at this time. Therefore, as set forth in 63.7510(j), the permittee shall complete the initial compliance demonstration and tune-up requirements by the deadlines specified in 63.7510(j) upon re-starting the emissions unit.</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	defined in this subpart. The permittee shall comply with the emission limitations and operating limitations for the applicable subcategory(s) specified in this section.]	
f.	40 CFR Part 63.1-15 (40 CFR 63.7565)	Table 10 to 40 CFR Part 63, Subpart DDDDD – Applicability of General Provisions (Subpart A) to Subpart DDDDD shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The emissions from emissions unit B011 shall be vented to a multiclone and baghouse in series.
- b. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

c) Operational Restrictions

- (1) The pressure drop across the baghouse shall be maintained within the range of 2.0 - 10.0 inches of water while the emissions unit is in operation.
(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))
- (2) The permittee shall only burn wood waste in this emissions unit.
(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))
- (3) The permittee shall comply with the applicable work practices and operating restrictions required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7500, 63.7515, 63.7540, and Table 3 to Subpart DDDDD	tune-up requirements
63.7500, 63.7510, and Table 3 to	one-time energy assessment requirements

Subpart DDDDD	
63.7500, 63.7505, and Table 3 to Subpart DDDDD	continuous monitoring system (CMS) requirements
63.7500, 63.7510, 63.7525, and Tables 4 and 7 to Subpart DDDDD	operating requirements
63.7500(a)(3)	general duty to minimize emissions
63.7505(a)	general compliance requirements

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart DDDDD)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the type and the quantity of wood waste burned in this emissions unit.

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

- (2) The permittee shall maintain annual records which summarize the daily records for the quantity of wood waste burned in this emissions unit.

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

- (3) The permittee shall maintain daily records listing days when a fuel other than wood waste was burned. For each day during which the permittee burns a fuel other than wood waste, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

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

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

- a. the date and time the deviation began;



- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- 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 rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

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

63.7521	fuel analyses requirements
63.7525 and	monitoring and record keeping requirements



63.7535	
63.7540	requirements for continuous compliance demonstration
63.7555	required overall records to be maintained
63.7560	record format and retention requirements

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD)

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0119135: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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 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 rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than wood waste was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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



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- (3) The permittee shall submit annual reports which specify the total PE, PM₁₀, SO₂, NO_x, CO, and VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 30 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

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

63.7545	notification requirements
63.7550 and Table 9 to Subpart DDDDD	content and submission of compliance reports

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD)

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0119135: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:**

PE and PM₁₀ emissions shall not exceed 0.10 lb/MMBtu and 12.57 TPY.

Applicable Compliance Method:

The actual PE/PM₁₀ emission rate, in lb/MMBtu, shall be calculated from the results of the most recent stack test which demonstrated compliance. The permittee shall conduct emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 as specified in f)(2) below (PE assumed to be equivalent to PM₁₀).

The annual PE/PM₁₀ emission limitation was established by multiplying the lb/MMBtu allowable emission rate above by the maximum rated capacity of the boiler at 28.7 MMBtu/hr, multiplied by 8,760 hours/yr, then divided by 2000 lbs/ton. Therefore, as long as compliance with the lb/MMBtu emission limitation is maintained, compliance with the annual PE/PM₁₀ emission limitation shall be demonstrated.



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

b. Emission Limitations:

SO₂ emissions shall not exceed 0.01 lb/MMBtu and 1.25 TPY.

Applicable Compliance Method:

The emission rate of 0.01 lb of SO₂/MMBtu of actual heat input represents the manufacturer's guaranteed emission factor as provided in the application for PTI 14-05714, submitted 4/20/2005. No emissions tests are specifically required to demonstrate compliance with the lb/MMBtu emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1 through 4 and 6 from 40 CFR Part 60, Appendix A.

The annual SO₂ emission limitation was established by multiplying the lb/MMBtu allowable emission rate above by the maximum rated capacity of the boiler at 28.7 MMBtu/hr, multiplied by 8,760 hours/yr, then divided by 2000 lbs/ton. Therefore, as long as compliance with the lb/MMBtu emission limitation is maintained, compliance with the annual SO₂ emission limitation shall be demonstrated.

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

c. Emission Limitations:

CO emissions shall not exceed 0.30 lb/MMBtu and 37.7 TPY.

Applicable Compliance Method:

The actual CO emission rate, in lb/MMBtu, shall be calculated from the results of the most recent stack test which demonstrated compliance. The permittee shall conduct emission testing in accordance with 40 CFR Part 60, Appendix A, Method 10, as specified in f)(2) below.

The annual CO emission limitation was established by multiplying the lb/MMBtu allowable emission rate above by the maximum rated capacity of the boiler at 28.7 MMBtu/hr, multiplied by 8,760 hours/yr, then divided by 2000 lbs/ton. Therefore, as long as compliance with the lb/MMBtu emission limitation is maintained, compliance with the annual CO emission limitation shall be demonstrated.

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

d. Emission Limitations:

NO_x emissions shall not exceed 0.604 lb/MMBtu and 75.9 TPY.

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Applicable Compliance Method:

The actual NO_x emission rate, in lb/MMBtu, shall be calculated from the results of the most recent stack test which demonstrated compliance. The permittee shall conduct emission testing in accordance with 40 CFR Part 60, Appendix A, Method 7, as specified in f)(2) below.

The annual NO_x emission limitation was established by multiplying the lb/MMBtu allowable emission rate above by the maximum rated capacity of the boiler at 28.7 MMBtu/hr, multiplied by 8,760 hours/yr, then divided by 2000 lbs/ton. Therefore, as long as compliance with the lb/MMBtu emission limitation is maintained, compliance with the annual NO_x emission limitation shall be demonstrated.

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

e. Emission Limitations:

VOC emissions shall not exceed 0.039 lb/MMBtu and 4.9 TPY.

Applicable Compliance Method:

The allowable emission rate of 0.039 lb of VOC/MMBtu of actual heat input represents the emission factor for total organics found in US EPA AP-42, Section 1.6 for wood residue combustion in boilers, Table 1.6-3, dated 9/2003. No emissions tests are specifically required to demonstrate compliance with the lb/MMBtu emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1 through 4 and 25 from 40 CFR Part 60, Appendix A.

The annual VOC emission limitation was established by multiplying the lb/MMBtu allowable emission rate above by the maximum rated capacity of the boiler at 28.7 MMBtu/hr, multiplied by 8,760 hours/yr, then divided by 2000 lbs/ton. Therefore, as long as compliance with the lb/MMBtu emission limitation is maintained, compliance with the annual VOC emission limitation shall be demonstrated.

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

f. Emission Limitation:

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



Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). See f)(2) below.

(Authority for term: OAC rules 3745-17-03(B)(1), 3745-17-07(A)(1), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months prior to expiration of this permit, unless the permittee has not operated this emissions unit during the 5-year term of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation for PE, NO_x, and CO, and the stack opacity limitation for visible particulate emissions.
 - c. Testing conducted to demonstrate compliance with 40 CFR Part 63, Subpart DDDDD, for any of the pollutants listed below may satisfy this testing requirement, for the specific pollutant, with prior approval of the Ohio EPA District Office or local air agency.
 - d. The following test method(s) and procedures shall be employed to demonstrate compliance with the allowable mass emission rate (in lb/MMBtu) for PE, NO_x, CO, and the opacity of visible particulate emissions:
 - i. 40 CFR Part 60, Appendix A, Methods 1 through 5 for PE,
 - ii. 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7 for NO_x,
 - iii. 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10 for CO, and
 - iv. 40 CFR Part 60, Appendix A, Method 9 and procedures in OAC rule 3745-17-03(B)(1) for visible particulate emissions.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe



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why they believe “worst case” operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute “worst case”. Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an “Intent to Test” notification to the Southwest Ohio Air Quality 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 Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).
- g. Personnel from the Southwest Ohio Air Quality 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.
- h. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southwest Ohio Air Quality Agency.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-17-07(A)(1), and 3745-77-07(C)(1))

- (3) The permittee shall comply with the applicable testing and compliance demonstration requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7510 and 63.7530	initial compliance demonstration requirements
63.7510, 63.7515, 63.7520 and Table 5 to Subpart DDDDD	performance testing requirements
63.7510, 63.7515, 63.7521 and Table 6 to Subpart DDDDD	fuel analyses requirements



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63.7540 and Table 8 to Subpart DDDDD	continuous compliance demonstration requirements
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(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD)

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0119135: f)(1) – f)(3). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

- g) Miscellaneous Requirements
 - (1) None.



2. K006, Treater 106

Operations, Property and/or Equipment Description:

Treater #106 - Resin paper coating line with electric curing oven

- 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(D) (PTI 14-04511, issued 4/3/2003) Synthetic Minor and Netting to Avoid Nonattainment New Source Review and Emission Offsets	VOC emissions from emissions units K006 and K014, combined, shall not exceed 98.9 TPY, based on a rolling, 12-month summation.
b.	OAC rule 3745-21-09(PP)(1)	The VOC content of the coatings employed shall not exceed 0.9 pound of VOC per gallon of coating, as applied, excluding water and exempt solvents.
c.	40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) National Emission Standard for Hazardous Air Pollutants: Paper and other Web Coating [In accordance with 40 CFR 63.3290, this emissions unit is an existing web coating line located at an existing facility that is a major source of HAP, subject to the emissions limitations and control measures specified in this section.]	As specified in 40 CFR 63.3320(b)(2) and (b)(3), organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) or more than 20 percent of the mass of coating solids applied (0.20 kg organic HAP per kg coating solid) for each month. See b)(2)a.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 63, Subpart A (40 CFR 63.1 – 15 and 40 CFR 63.3340)	Table 2 to 40 CFR Part 63, Subpart JJJJ- Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. Pursuant to 63.3370, the permittee may demonstrate compliance with the organic HAP emission limitations in b)(1)c. above in accordance to the following methods for this uncontrolled emissions unit:

63.3370(a)(1)	use of “as-purchased” compliant coating materials according to the procedures specified in 63.3370(b)
63.3370(a)(2)	use of “as-applied” compliant coating materials according to the procedures specified in 63.3370(c)(1) – (c)(5)
63.3370(a)(3)	tracking total monthly organic HAP applied according to the procedures specified in 63.3370(d)

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee, having chosen to demonstrate compliance with OAC rule 3745-21-09(PP)(1) through the use of VOC compliant coatings, shall collect and record the following information each month for the paper treater and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and
 b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

(Authority for term: OAC rules 3745-21-09(B)(3)(f), 3745-21-10(B)(8), 3745-21-09(PP)(1), and 3745-77-07(C)(1))

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

63.3410(a)(1)	Recordkeeping requirements
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(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

- (3) The permittee shall collect and record the following information for this emissions unit on a monthly basis:

- a. the name and identification number of each coating and cleanup material employed;
- b. the VOC content of each coating and cleanup material, as applied;
- c. the number of gallons of each coating and cleanup material employed; and
- d. the total VOC emissions from all coatings and cleanup materials employed [the summation of d)(3)b. x d)(3)c.], in pounds or tons.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

- (4) The permittee shall collect and record the following information on a monthly basis:

- a. the total VOC emissions from all coatings, cleanup materials employed, and natural gas combusted in emissions units K006 and K014, combined, in tons; and



- b. the rolling, 12-month summation of the total VOC emissions for emissions units K006 and K014, combined (the current monthly total VOC emissions added to the total VOC emissions for the previous 11 months), in tons.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-04511: d)(1) - d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Southwest Ohio Air Quality Agency within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B)(3)(g), 3745-21-09(PP)(1), and 3745-77-07(C)(1))

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

63.3400(a)	Reporting requirements - general
63.3400(b)	Initial notification requirements
63.3400(c)(1) and (2)	Semiannual compliance report requirements
63.3400(e)	Notification of Compliance Status

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

- (3) The permittee shall submit quarterly deviation (excursion) reports for any monthly record documenting an exceedance of the rolling, 12-month VOC emission limitation for emissions units K006 and K014, combined.

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 rules 3745-31-05(D) and 3745-77-07(C)(1))

- (4) The permittee shall submit annual reports which include the total VOC emissions for emissions units K006 and K014, combined, for the previous calendar year, and include the updated rolling, 12-month summation of VOC emissions for each calendar month in the reporting period. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-04511: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

VOC emissions from emissions units K006 and K014, combined, shall not exceed 98.9 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements in d)(3) and d)(4).

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

b. Emission Limitation:

The VOC content of the coatings employed shall not exceed 0.9 pound of VOC per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the coating content limitation shall be demonstrated based on the recordkeeping requirements in d)(1) of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of coatings.

(Authority for term: OAC rules 3745-21-09(PP)(1), 3745-21-10(B), and 3745-77-07(C)(1))

c. Emission Limitations:

Organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) or more than 20 percent of the mass of coating solids applied (0.20 kg organic HAP per kg coating solid) for each month.



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Applicable Compliance Method:

Compliance with the applicable organic HAP emission limitation shall be determined by the methods listed in b)(2)a., the record keeping requirements in d)(2), and the procedures specified in f)(2) below.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

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

63.3360(a)(1)	Performance test methods for control of organic HAP emissions by limiting organic HAP or volatile matter content of coatings
63.3360(c)	Methods for determining organic HAP content of coatings
63.3360(d)	Methods for determining volatile organic and coating solids content of coatings

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-04511: f)(1) and f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



3. K013, Treater 99

Operations, Property and/or Equipment Description:

Treater #99 - Resin paper coating line with 6.36 MMBtu/hour natural gas-fired curing oven

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-04281, issued 7/23/1997)	VOC emissions shall not exceed 234 lbs/hour from coatings*. See b)(2)a. *The short-term VOC emission limitation is based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with this emission limitation. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-07(A), and 3745-21-09(PP).
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Nonattainment New Source Review and Emission Offsets	VOC emissions shall not exceed 38.77 TPY, based upon a rolling, 12-month summation, from all coatings, cleanup materials, and natural gas combustion.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-10(B)(1)	The PE limitation of 0.020 lb/MMBtu specified in this rule for natural gas combustion is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-09(PP)(1)	The VOC content of the coatings employed shall not exceed 0.9 pound of VOC per gallon of coating, as applied, excluding water and exempt solvents.
f.	40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) National Emission Standard for Hazardous Air Pollutants: Paper and other Web Coating [In accordance with 40 CFR 63.3290, this emissions unit is an existing web coating line located at an existing facility that is a major source of HAP, subject to the emissions limitations and control measures specified in this section.]	As specified in 40 CFR 63.3320(b)(2) and (b)(3), organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) or more than 20 percent of the mass of coating solids applied (0.20 kg organic HAP per kg coating solid) for each month. See b)(2)b.
g.	40 CFR Part 63, Subpart A (40 CFR 63.1 – 15 and 40 CFR 63.3340)	Table 2 to 40 CFR Part 63, Subpart JJJJ- Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The curing oven emissions, from natural gas combustion, shall not exceed the following:

PE/PM₁₀ - 0.012 lb/MMBtu* and 0.33 TPY*;

SO₂ - 0.0006 lb/MMBtu* and 0.02 TPY*;

CO - 0.021 lb/MMBtu* and 0.6 TPY*;

NO_x - 0.10 lb/MMBtu* and 2.8 TPY*; and



VOC - 0.0058 lb/MMBtu*.

*The lb/MMBtu and TPY emission limitations above for emissions from the curing oven were based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.

- b. Pursuant to 63.3370, the permittee may demonstrate compliance with the organic HAP emission limitations in b)(1)f. above in accordance to the following methods for this uncontrolled emissions unit:

63.3370(a)(1)	use of "as-purchased" compliant coating materials according to the procedures specified in 63.3370(b)
63.3370(a)(2)	use of "as-applied" compliant coating materials according to the procedures specified in 63.3370(c)(1) – (c)(5)
63.3370(a)(3)	tracking total monthly organic HAP applied according to the procedures specified in 63.3370(d)

- c) Operational Restrictions

- (1) None.

- d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee, having chosen to demonstrate compliance with OAC rule 3745-21-09(PP) through the use of VOC compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and
 - b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.



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W_w = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_w = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

(Authority for term: OAC rules 3745-21-09(B)(3)(f), 3745-21-10(B)(8), 3745-21-09(PP), 3745-31-05(A)(3), and 3745-77-07(C)(1))

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

63.3410(a)(1)	Recordkeeping requirements
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(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

- (3) The permittee shall collect and record the following information for this emissions unit on a monthly basis:

- a. the name and identification number of each coating and cleanup material employed;
- b. the density, in pound per gallon, and formaldehyde content, by percent weight, of each coating employed;
- c. the VOC content of each coating and cleanup material, as applied;
- d. the number of gallons of each coating and cleanup material employed; and
- e. the total VOC emissions from all coatings and cleanup materials employed (the summation of d)(3)c. x d)(3)d.), in pounds or tons.
- f. the total amount of natural gas combusted in the curing oven;
- g. the total VOC emissions from the combustion of natural gas in the curing oven (the total amount of natural gas burned per month in cubic feet x 1020 Btu/cubic foot of natural gas x 0.0054 lb VOC/MMBtu*);

*emission factor taken from AP-42, Fifth Edition, 7/98, Section 1.4 Natural Gas Combustion

- h. the total VOC emissions from this emissions unit, d)(3)e. + d)(3)f., in pounds or tons; and



- i. the rolling, 12-month summation of the total VOC emissions for this emissions unit (the current monthly total VOC emissions added to the total VOC emissions for the previous 11 months), in tons.

(Authority for term: OAC rules 3745-31-05(D), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-04281: d)(1) - d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Southwest Ohio Air Quality Agency within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B)(3)(g), 3745-21-09(PP)(1), 3745-31-05(A)(3), and 3745-77-07(C)(1))

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

63.3400(a)	Reporting requirements - general
63.3400(b)	Initial notification requirements
63.3400(c)(1) and (2)	Semiannual compliance report requirements
63.3400(e)	Notification of Compliance Status

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

- (3) The permittee shall submit quarterly deviation (excursion) reports for any monthly record documenting an exceedance of the 38.77 TPY rolling, 12-month VOC emission limitation.

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 rules 3745-31-05(D), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-04281: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this

operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

VOC emissions shall not exceed 234 lbs/hour from coatings.

Applicable Compliance Method:

The VOC emission limitation above reflects the potential to emit calculated from the maximum coating application rate of 260 gallons/hour, as provided by the permittee in the application for PTI 14-04281, and the allowable VOC content limitation of 0.9 lb VOC/gallon. Record keeping requirements specified in d)(1) demonstrate compliance with the allowable VOC coating content.

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

b. Emission Limitation:

Visible particulate emissions 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 shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1), 3745-17-07(A), 3745-31-05(A)(3), and 3745-77-07(C)(1))

c. Emission Limitation:

VOC emissions shall not exceed 38.77 TPY, based upon a rolling, 12-month summation, from all coatings, cleanup materials, and natural gas combustion.



Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements in d)(3).

(Authority for term: OAC rules 3745-31-05(D), 3745-31-05(A)(3), and 3745-77-07(C)(1))

d. Emission Limitation:

The VOC content of the coatings employed shall not exceed 0.9 pound of VOC per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the coating content limitation shall be demonstrated based on the recordkeeping requirements in d)(1) of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of coatings.

(Authority for term: OAC rules 3745-21-09(PP), 3745-31-05(A)(3), and 3745-77-07(C)(1))

e. Emission Limitations:

Organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) or more than 20 percent of the mass of coating solids applied (0.20 kg organic HAP per kg coating solid) for each month.

Applicable Compliance Method:

Compliance with the applicable organic HAP emission limitation shall be determined by the methods listed in b)(2)b., the record keeping requirements in d)(2), and the procedures specified in f)(2) below.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

f. Emission Limitations:

The curing oven emissions shall not exceed the following:

PE/PM₁₀ - 0.012 lb/MMBtu and 0.33 TPY;

SO₂ - 0.0006 lb/MMBtu and 0.02 TPY;

CO - 0.021 lb/MMBtu and 0.6 TPY;

NO_x - 0.10 lb/MMBtu and 2.8 TPY; and

VOC - 0.0058 lb/MMBtu.



Applicable Compliance Method:

The lb/MMBtu and TPY emission limitations above reflect the potential to emit based on natural gas combustion and AP-42 emission factors. The annual emission limitations assume operation at 8,760 hours per year at the maximum rated heat input capacity, 6.36 MMBtu/hour. Compliance shall be determined based upon calculations using the US EPA AP-42 emission factors for each pollutant found in Section 1.4, Natural Gas Combustion, Tables 1.4-1 and 1.4-2, dated 7/98.

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

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

63.3360(a)(1)	Performance test methods for control of organic HAP emissions by limiting organic HAP or volatile matter content of coatings
63.3360(c)	Methods for determining organic HAP content of coatings
63.3360(d)	Methods for determining volatile organic and coating solids content of coatings

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-04281: f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



4. K014, Treater 109

Operations, Property and/or Equipment Description:

Treater #109 - Resin paper coating line with 15 MMBtu/hr natural gas-fired curing oven, controlled by a thermal oxidizer and permanent total enclosure

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-04511, issued 4/3/2003)	VOC emissions shall not exceed 11.0 lbs/hour from coatings.* See b)(2)a. - b)(2)c. *The short-term VOC emission limitation is based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with this emission limitation. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A).
b.	OAC rule 3745-31-05(D) (PTI 14-04511, issued 4/3/2003) Synthetic Minor and Netting to Avoid Nonattainment New Source Review and Emission Offsets	VOC emissions from emissions unit K014 shall not exceed 31.5 TPY, based upon a rolling, 12-month summation, from all coatings, cleanup materials, and natural gas combustion. VOC emissions from emissions units K006 and K014, combined, shall not exceed 98.9 TPY, based on a rolling, 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-10(B)(1)	The PE limitation of 0.020 lb/MMBtu specified in this rule for natural gas combustion is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-09(PP)(2)	The VOC capture and control system requirement specified in this rule is less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3) in b)(2)a.
f.	40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) National Emission Standard for Hazardous Air Pollutants: Paper and other Web Coating [In accordance with 40 CFR 63.3290, this emissions unit is an existing web coating line located at an existing facility that is a major source of HAP, subject to the emissions limitations and control measures specified in this section.]	As specified in 40 CFR 63.3320(b)(2) and (b)(3), organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) or more than 20 percent of the mass of coating solids applied (0.20 kg organic HAP per kg coating solid) for each month. See b)(2)d.
g.	40 CFR Part 63, Subpart A (40 CFR 63.1 – 15 and 40 CFR 63.3340)	Table 2 to 40 CFR Part 63, Subpart JJJJ- Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
h.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)e., (d)(4) - d)(12), e)(1), e)(4), and f)(2).

(2) Additional Terms and Conditions

a. This emissions unit shall be equipped with a permanent total enclosure system with 100 percent capture efficiency, in accordance with Appendix M of 40 CFR Part 51, Method 204, and a thermal incinerator with a minimum 95 percent VOC and organic HAP control efficiency, thus giving an overall control efficiency of 95 percent.

b. The curing oven emissions, from natural gas combustion, shall not exceed the following:

PE/PM₁₀ - 0.0137 lb/MMBtu and 0.9 TPY*;

SO₂ - 0.0006 lb/MMBtu and 0.04 TPY*;

CO - 0.035 lb/MMBtu and 2.3 TPY*;

NO_x - 0.14 lb/MMBtu and 9.2 TPY*; and

VOC - 0.0058 lb/MMBtu*.

*The lb/MMBtu and TPY emission limitations above for emissions from the curing oven were based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.

c. The oxidizer emissions, from natural gas combustion, shall not exceed the following:

PE/PM₁₀ - 0.012 lb/MMBtu and 0.09 TPY*;

SO₂ - 0.0006 lb/MMBtu and 0.004 TPY*;

CO - 0.021 lb/MMBtu and 0.16 TPY*;

NO_x - 0.10 lb/MMBtu and 0.75 TPY*; and

VOC - 0.0058 lb/MMBtu*.

*The lb/MMBtu and TPY emission limitations above for emissions from the incinerator were based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.

d. Pursuant to 63.3370, the permittee may demonstrate compliance with the organic HAP emission limitations in b)(1)f. above in accordance to the following methods for this uncontrolled emissions unit:

63.3370(a)(1)	use of “as-purchased” compliant coating materials according to the procedures specified in 63.3370(b)
63.3370(a)(2)	use of “as-applied” compliant coating materials according to the procedures specified in 63.3370(c)(1) – (c)(5)
63.3370(a)(3)	tracking total monthly organic HAP applied according to the procedures specified in 63.3370(d)

- e. At all times, the permittee shall maintain the continuous monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the continuous monitoring equipment, in accordance with the proper maintenance requirements of CAM.

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

c) Operational Restrictions

- (1) The average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

- (2) The permanent total enclosure shall be maintained under negative pressure at a minimum pressure differential that is not less than 0.007 inch of water for any 3-hour block of time whenever the emissions unit is in operation.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

- (3) The emissions unit shall be total enclosed such that VOC emissions are captured and contained for discharge through the regenerative thermal oxidizer. Compliance with the following criteria shall satisfy a portion of the requirements identified by US EPA Method 204 for total enclosure:

- a. any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point;
- b. the total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure’s four walls, floor, and ceiling;
- c. the direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) which corresponds to a pressure differential of 0.007 in. H₂O (0.013 mm Hg);
- d. all access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5

percent surface area determination in "b", shall be closed during routine operation of the process; and,

- e. all VOC emissions shall be captured and contained for discharge through the VOC control device.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

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

- (1) The permittee shall collect and record the following information for this emissions unit on a monthly basis:

- a. the name and identification number of each coating and cleanup material employed;
- b. the VOC content of each coating and cleanup material, as applied;
- c. the number of gallons of each coating and cleanup material employed; and
- d. the total VOC emissions from all coatings and cleanup materials employed [the summation of d)(1)b. x d)(1)c.], in pounds or tons.

- e. the total amount of natural gas combusted in the curing oven;

- f. the total VOC emissions from the combustion of natural gas in the curing oven [the total amount of natural gas burned per month in cubic feet x 1020 Btu/cubic foot of natural gas x 0.0054 lb. VOC/MMBtu*]; and

*emission factor taken from AP-42, Fifth Edition, 7/98, Section 1.4 Natural Gas Combustion

- g. the total VOC emissions from this emissions unit, d)(1)d. + d)(1)f., in pounds or tons.

(Authority for term: OAC rules 3745-31-05(D), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (2) The permittee shall collect and record the following information on a monthly basis:

- a. the rolling, 12-month summation of the total VOC emissions for this emissions unit (the current monthly total VOC emissions in d)(1)g. added to the total VOC emissions for the previous 11 months), in tons;
- b. the total VOC emissions from all coatings, cleanup materials employed, and natural gas combusted in emissions units K006 and K014, combined, in tons; and

- c. the rolling, 12-month summation of the total VOC emissions for emissions units K006 and K014, combined (the current monthly total VOC emissions added to the total VOC emissions for the previous 11 months), in tons.

(Authority for term: OAC rules 3745-31-05(D), 3745-31-05(A)(3), and 3745-77-07(C)(1))

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

63.3410(a)(1)	Recordkeeping requirements
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(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

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

The permittee shall collect and record the following information each day the emissions unit is in operation:

- a. all 3-hour blocks of time, when the emissions unit controlled by the thermal oxidizer was in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance; and
- b. 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.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1) and 40 CFR Part 64)

- (5) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

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

- a. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and
- b. 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.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1) and 40 CFR Part 64)

- (6) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):
 - a. the measured diameter of each natural draft opening;
 - b. the distance measured from each natural draft opening to each VOC emitting point;
 - c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;
 - d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and
 - e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1) and 40 CFR Part 64)

- (7) The CAM plan for this emissions unit has been developed for VOC emissions. The CAM performance indicators for VOC emissions are the average combustion temperature within the regenerative thermal oxidizer as measured and recorded by the continuous temperature monitoring system, the pressure differential of the permanent total enclosure as measured and recorded by the continuous differential pressure monitoring system, and the regenerative thermal oxidizer inspections. The temperature and pressure differential indicator range/limit are identified in terms c)(1) and c)(2), and shall be demonstrated from the values recorded in d)(4) and d)(5). A secondary performance indicator for the oxidizer is the result of the routine inspections specified in d)(10). An excursion of this performance indicator is defined as any occasion when a problem is detected with the structural integrity, combustion zone, and/or operation of the thermal oxidizer.

When the combustion temperature and/or pressure differential values over the averaging period of the indicator range/limit are outside the range/limit specified in this permit, and/or the oxidizer inspection results detect an operational problem, corrective action (including, but not limited to, an evaluation of the emissions unit, monitoring equipment, capture system, and thermal oxidizer) shall be assessed and implemented as appropriate.

Upon detecting an excursion, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range/limit.

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

- (8) Whenever the monitored average combustion temperature within the regenerative thermal oxidizer deviates from the range established in c)(1) of 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 above to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the regenerative thermal oxidizer 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 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.

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3) and 40 CFR Part 64)

- (9) Whenever the monitored pressure differential deviates from the value established in c)(2) of 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 capture device (enclosure) within the acceptable value 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 differential pressure 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.

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3) and 40 CFR Part 64)

- (10) The permittee shall conduct inspections of the regenerative thermal oxidizer controlling this emissions unit as follows:

<u>Inspection</u>	<u>Frequency</u>
external structural integrity	quarterly
internal inspection/valve leak check	annually
combustion zone destruction efficiency*	annually*

*evaluation using Flame Ionization Analyzer for three 20-minute runs may be conducted in lieu of the annual internal inspection/valve leak check.

The permittee shall maintain records the following information for each inspection conducted:

- a. the date and time the inspection took place;
- b. the name and job title of the employee(s) conducting the inspection;
- c. a summary of any problems found during the inspection; and
- d. a listing of corrective actions taken, if any.

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.

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

- (11) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring 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)

- (12) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64)

- (13) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-04511: d)(1) - d)(12). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which identify the following:
- a. an identification of all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit;
 - b. an identification of all exceedances of the rolling, 12-month VOC emission limitation for emissions units K006 and K014, combined;
 - c. all 3-hour blocks when the average temperature within the combustion chamber of the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature recorded during the most recent stack test that demonstrated compliance;
 - d. all three-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water;
 - e. each inspection conducted in d)(10) that detected an operational or structural integrity problem with the thermal oxidizer;
 - f. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit was in operation; and
 - g. the cause of each incident reported in e)(1)c., e)(1)d., and e)(1)e. above, and the corrective actions taken.

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

(Authority for term: OAC rules 3745-31-05(D), 3745-31-05(A)(3), and 3745-77-07(C)(1) and 40 CFR Part 64)



Effective Date: To be entered upon final issuance

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

63.3400(a)	Reporting requirements - general
63.3400(b)	Initial notification requirements
63.3400(c)(1) and (2)	Semiannual compliance report requirements
63.3400(e)	Notification of Compliance Status

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

- (3) The permittee shall submit annual reports which include the total VOC emissions for emissions units K006 and K014, combined, for the previous calendar year, and include the updated rolling, 12-month summation of VOC emissions for each calendar month in the reporting period. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rules 3745-31-05(D), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (4) If the permittee is required under 40 CFR Part 64.8 and d)(12) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

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

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-04511: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

VOC emissions shall not exceed 11.0 lbs/hour from coatings.

Applicable Compliance Method:

The VOC emission limitation above was calculated from the maximum production rate of 5000 pounds/hour of resin, as provided by the permittee in the application for PTI 14-04511, the permittee-provided VOC emission factor of 0.044 lb VOC/lb



of resin, and the overall 95% VOC control efficiency requirement. Stack testing in f)(2) will verify the VOC emission factor and determine compliance with the VOC emission limitation and control efficiency requirements.

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

b. Emission Limitations:

The curing oven emissions shall not exceed the following:

PE/PM₁₀ - 0.0137 lb/MMBtu and 0.9 TPY;

SO₂ - 0.0006 lb/MMBtu and 0.04 TPY;

CO - 0.035 lb/MMBtu and 2.3 TPY;

NO_x - 0.14 lb/MMBtu and 9.2 TPY; and

VOC - 0.0058 lb/MMBtu.

Applicable Compliance Method:

The lb/MMBtu and TPY emission limitations above reflect the potential to emit based on natural gas combustion and AP-42 emission factors. The annual emission limitations assume operation at 8,760 hours per year at the maximum rated heat input capacity, 15 MMBtu/hour. Compliance shall be determined based upon calculations using the US EPA AP-42 emission factors for each pollutant found in Section 1.4, Natural Gas Combustion, Tables 1.4-1 and 1.4-2, dated 7/98.

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

c. Emission Limitations:

The oxidizer emissions shall not exceed the following:

PE/PM₁₀ - 0.012 lb/MMBtu and 0.09 TPY;

SO₂ - 0.0006 lb/MMBtu and 0.004 TPY;

CO - 0.021 lb/MMBtu and 0.16 TPY;

NO_x - 0.10 lb/MMBtu and 0.75 TPY; and

VOC - 0.0058 lb/MMBtu.

Applicable Compliance Method:

The lb/MMBtu and TPY emission limitations above reflect the potential to emit based on natural gas combustion and AP-42 emission factors. The annual emission limitations assume operation at 8,760 hours per year at the maximum



rated heat input capacity, 1.75 MMBtu/hour. Compliance shall be determined based upon calculations using the US EPA AP-42 emission factors for each pollutant found in Section 1.4, Natural Gas Combustion, Tables 1.4-1 and 1.4-2, dated 7/98.

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

d. Emission Limitations:

VOC emissions from emissions unit K014 shall not exceed 31.5 TPY, based upon a rolling, 12-month summation, from all coatings, cleanup materials, and natural gas combustion.

VOC emissions from emissions units K006 and K014, combined, shall not exceed 98.9 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements in d)(1) and d)(2).

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D), and 3745-77-07(C)(1))

e. Emission Limitations:

Organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) or more than 20 percent of the mass of coating solids applied (0.20 kg organic HAP per kg coating solid) for each month.

Applicable Compliance Method:

Compliance with the applicable organic HAP emission limitation shall be determined by the methods listed in b)(2)d., the record keeping requirements in d)(3), and the procedures specified in f)(3) below.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

f. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).



No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1), 3745-17-07(A), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted approximately 2.5 years after issuance of the permit (following the effective date for this Title V permit) and within 6 months prior to the permit expiration.
 - b. The emission testing shall be conducted to verify the VOC emission factor provided in the application for PTI 14-04511, and demonstrate compliance with the allowable VOC emission limitation, in pounds/hour, and the overall control efficiency requirement.
 - c. The following test method(s) and procedures shall be employed to demonstrate compliance with the allowable emission limitations and control efficiency requirements:
 - i. 40 CFR Part 60, Appendix A, Methods 1 through 4, and Methods 18, 24, 25, and/or 25A for VOC;
 - ii. the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.); and
 - iii. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- d. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved



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include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under “worst case” conditions expected during the life of the permit. As part of the information provided in the “Intent to Test” notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe “worst case” operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute “worst case”. Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

- e. During the emissions testing, the permittee shall collect and maintain a record of the temperature within the combustion chamber of the thermal oxidizer and the pressure differential of the enclosure during each three one-hour compliance runs.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an “Intent to Test” notification to the Southwest Ohio Air Quality 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 Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).
- g. Personnel from the Southwest Ohio Air Quality 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.
- h. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southwest Ohio Air Quality Agency.

(Authority for term: OAC rules 3745-31-05(D), 3745-31-05(A)(3), and 3745-77-07(C)(1) and 40 CFR Part 64)

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

63.3360(a)(1)	Performance test methods for control of organic HAP emissions by limiting organic HAP or volatile matter content of coatings
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63.3360(c)	Methods for determining organic HAP content of coatings
63.3360(d)	Methods for determining volatile organic and coating solids content of coatings

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-04511: f)(1) - f)(3). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

5. P059, #3 Trimming Operation

Operations, Property and/or Equipment Description:

#3 Trim Line, with cyclone and baghouse

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(1) Table I	PE shall not exceed 9.51 pounds per hour.
c.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)a., (d)(1) - d)(6), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. At all times, the permittee shall maintain the continuous monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the continuous monitoring equipment, in accordance with the proper maintenance requirements of CAM.

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions are the visible emissions observations of the baghouse stack, the pressure drop of the baghouse as measured and recorded by the continuous pressure drop monitoring system, and the cyclone inspections.

For visible emissions, the performance indicator is the presence or absence of visible emissions identified in d)(2). An excursion of this performance indicator is defined as any occasion when visible emissions are observed exiting the baghouse stack and are not deemed to be from normal operations.

The pressure drop performance indicator range is between 1 and 6 inches of water column across the baghouse and shall be demonstrated from the values recorded in d)(3). An excursion of this performance indicator is defined as any pressure drop value recorded in d)(3) outside this pressure drop range.

The performance indicator for the cyclone, which exhausts into the baghouse, is the result of the routine inspections specified in d)(4). An excursion of this performance indicator is defined as any occasion when a problem is detected with the structural integrity, material buildup, and/or operation of the cyclone.

When the visible emission observations indicate an excursion, the pressure drop values are outside the indicator range, and/or the cyclone inspection results detect an operational problem, corrective action (including, but not limited to, an evaluation of the emissions unit, monitoring equipment, baghouse, and cyclone) shall be assessed and implemented as appropriate.

Upon detecting an excursion, the owner or operator shall restore operation of the emissions unit (including the control devices) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range/parameter.

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

- (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 baghouse 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;
- e. any corrective actions taken to minimize or eliminate the visible emissions;
- f. the date and time the corrective action was completed; and
- g. the names of the personnel who performed the work.

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

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.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and 40 CFR Part 64)

- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The 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. The indicator range established for the pressure drop across the baghouse is between 1 and 6 inches of water. The permittee shall record the pressure drop across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop is outside the range established above, the permittee shall promptly investigate the cause of the excursion. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the excursion was first observed;
- b. the magnitude of the excursion 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 an excursion, 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 excursion 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 excursion ended;
- i. the total period of time (in minutes) during which there was an excursion;
- j. the pressure drop readings 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.

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

- (4) The permittee shall conduct an internal inspection of the cyclone controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following:
 - a. a review of the structural integrity for all components of the cyclone;
 - b. inspection of the inside surfaces of the cyclone for deposits or blockages; and
 - c. an inspection of the bottom of the cyclone for plugging.

The permittee shall maintain records the following information for each inspection conducted:

- d. the date and time the inspection took place;
- e. the name and job title of the employee(s) conducting the inspection;
- f. a summary of any problems found during the inspection; and
- g. a listing of corrective actions taken, if any.

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.

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

- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring 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)

- (6) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly excursion reports that identify the following:
- a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and the cause of each incident;
 - b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse(s) was outside of the range specified in d)(3) and the cause of each incident;
 - c. each inspection conducted in d)(4) that detected an operational or structural integrity problem and the cause of each incident;
 - d. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with QA/QC or other calibration checks) while the emissions unit was in operation and the cause of each incident;
 - e. the corrective action(s) taken for each incident described in (a), (b), and (c);



- f. an identification of each incident described in (a), (b), and (c) where a prompt investigation was not conducted;
- g. an identification of each incident described in (a), (b), and (c) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in d)(3) into an acceptable range, was determined to be necessary and was not taken; and
- h. an identification of each incident described in (a), (b), and (c) where proper records were not maintained for the investigation and/or the corrective action(s).

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

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A), and 40 CFR Part 64)

- (2) If the permittee is required under 40 CFR Part 64.8 and d)(6) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

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

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 stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1)(a), 3745-17-07(A), and 3745-77-07(C)(1))



b. Emission Limitation:

PE shall not exceed 9.51 pounds per hour.

Applicable Compliance Method:

The hourly PE rate above is based on Table I in OAC rule 3745-17-11 using the maximum process weight rate of 7020 lbs/hour for the emissions unit. This emission limitation is greater than the controlled potential to emit calculated using the following equation:

$7020 \text{ pounds/hr maximum processing rate} \times (0.077 \text{ lb scrap/lb of product}^*) \times (1 - 0.99 \text{ cyclone control efficiency}^*) \times (1 - 0.998 \text{ baghouse control efficiency}^*) = 0.011 \text{ pound PE/hour}$

*Based on material balance, manufacturer control efficiencies, and emission information included with the prior permit applications, submitted 3/4/83 (formerly part of P025), and the Title V application, submitted 12/29/2015.

No emissions tests are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-5 from 40 CFR Part 60, Appendix A.

(Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) None.



6. P060, #4 Trimming Operation

Operations, Property and/or Equipment Description:

#4 Trim Line with cyclone

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-2783, issued 9/30/1992)	See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(1)	The hourly PE limitation established by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See (d)(1) - d)(5), and e)(1) – e)(2).

(2) Additional Terms and Conditions

a. The PE and PM₁₀ emissions from emissions units P060 and P072, combined, shall not exceed the following:

1.2 lbs. of PE/hour* and 0.9 lb. of PM₁₀/hour*; and



5.27 TPY of PE* and 3.94 TPY of PM₁₀*.

Emissions units P060 (trim line) and P072 (sand line) are operationally united. They have individual control devices and combined emission limitations.

*The PE and PM₁₀ emission limitations established in PTI 14-2783 were based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions are the visible emissions observations of the cyclone stack and the cyclone inspections.

For visible emissions, the performance indicator is the presence or absence of visible emissions identified in d)(2). An excursion of this performance indicator is defined as any occasion when visible emissions are observed exiting the cyclone stack and are not deemed to be from normal operations.

The performance indicator for the cyclone is the result of the routine inspections specified in d)(3). An excursion of this performance indicator is defined as any occasion when a problem is detected with the structural integrity, material buildup, and/or operation of the cyclone.

When the visible emission observations indicate an excursion, and/or the cyclone inspection results detect an operational problem, corrective action (including, but not limited to, an evaluation of the emissions unit and cyclone) shall be assessed and implemented as appropriate.

Upon detecting an excursion, the owner or operator shall restore operation of the emissions unit (including the control devices) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range/parameter.

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

- (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 cyclone

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;
- e. any corrective actions taken to minimize or eliminate the visible emissions;
- f. the date and time the corrective action was completed; and
- g. the names of the personnel who performed the work.

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

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.

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A), 3745-31-05(A)(3), and 40 CFR Part 64)

- (3) The permittee shall conduct an internal inspection of the cyclone controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following:
 - a. a review of the structural integrity for all components of the cyclone;
 - b. inspection of the inside surfaces of the cyclone for deposits or blockages; and
 - c. an inspection of the bottom of the cyclone for plugging.

The permittee shall maintain records the following information for each inspection conducted:

- d. the date and time the inspection took place;

- e. the name and job title of the employee(s) conducting the inspection;
- f. a summary of any problems found during the inspection; and
- g. a listing of corrective actions taken, if any.

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.

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

- (4) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring 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)

- (5) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

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

- (6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-2783: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly excursion reports that identify the following:
 - a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and the cause of each incident;

- b. each inspection conducted in d)(3) that detected an operational or structural integrity problem and the cause of each incident;
- c. the corrective action(s) taken for each incident described in (a) and (b);
- d. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;
- e. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance, was determined to be necessary and was not taken; and
- f. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

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

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A), 3745-31-05(A)(3), and 40 CFR Part 64)

- (2) If the permittee is required under 40 CFR Part 64.8 and d)(5) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

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

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-2783: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.



Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1)(a), 3745-17-07(A)(1), 3745-31-05(A)(3), and 3745-77-07(C)(1))

b. Emission Limitations:

The total PE and PM₁₀ emissions from emissions units P060 and P072, combined, shall not exceed the following:

1.2 lbs. of PE/hour and 0.9 lb. of PM₁₀/hour; and

5.27 TPY of PE and 3.94 TPY of PM₁₀.

Applicable Compliance Method:

The short-term (lb/hour) PE and PM₁₀ emission limitations above represent the controlled potential to emit and were calculated using the following equations:

Emissions from Trim Line #4, P060

276.3 pounds/hr maximum scrap rate* x (1-0.999 cyclone control efficiency*) = 0.3 pound PE/hour

Emissions from Sanding Line #4, P072

450 pounds/hr maximum scrap rate* x (1-0.998 baghouse control efficiency*) = 0.9 pound PE/PM₁₀/hour

Total PE = 0.3 lb/hr + 0.9 lb/hr = 1.2 lbs/hour for P061 and P072, combined

Total PM₁₀ = 0.9 lb/hr for P061 and P072, combined

*Based on material balance, manufacturer control efficiencies, and emission information included with the application for PTI 14-2783, submitted on 8/24/92 (formerly identified as P001). The PM₁₀ emission limitations assume all the trimmer emissions are greater than 10 microns in diameter, and all the sander emissions are less than 10 microns in diameter as provided in the PTI application.

The combined ton per year emission limitations were developed by multiplying the short-term PE and PM₁₀ emission rates (1.2 lb/hr and 0.9 lb/hr, respectively) by the maximum annual hours of operation (8,760 hours), and then dividing by



2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitations, compliance shall also be shown with the annual emission limitations.

No emissions tests are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-5 from 40 CFR Part 60, Appendix A.

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

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-2783: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) **Miscellaneous Requirements**

- (1) None.

7. P061, #5 Trimming Operation

Operations, Property and/or Equipment Description:

#5 Trim Line with cyclone

- 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.	ORC 3704.03(T) and OAC rule 3745-31-03(A)(3) (PTI #P0120516, issued 6/6/2016)	Install a cyclone control device associated with emissions unit P061 with a design control efficiency of at least 99% for PE.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	PM ₁₀ emissions shall not exceed 0.10 ton per month averaged over a twelve-month rolling period for emissions unit P061. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/06	Best Available Technology (BAT) exemption. See b)(2)b.
d.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Prevention of Significant Deterioration (PSD)	The total PE from emissions units P061 and P073, combined, shall not exceed 23.72 TPY, based on a rolling, 12-month summation. See c)(1).
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(B)(1)	The hourly particulate emission limitation established by this rule is less stringent than the maximum calculated hourly



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		controlled PE limitation using the control efficiency established pursuant to ORC 3704.03(T) in b)(1)a.
g.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See (d)(2) - d)(6), and e)(2) – e)(3).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the 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 3745-31-05, then these emission limits/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 State Implementation Plan:

Permit to Install P0120516 for this contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. the PM₁₀ emissions from emissions unit P061 shall be vented to a cyclone with a minimum control efficiency of 99 percent at all times when emissions unit P061 is in operation; and
- ii. the total amount of product trimmed/processed in emissions unit P061 shall not exceed 30,747.6 tons per year.

c) Operational Restrictions

- (1) The maximum annual production rate for emissions unit P061 shall not exceed 30,747.6 tons per year, based upon a rolling, 12-month summation of the production rates.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall calculate and maintain monthly records of the following information:
 - a. the production rate for emissions unit P061, in tons;
 - b. the rolling, 12-month summation of the production rates for emissions unit P061 (the total production rate for the current month, plus the total production rate for the previous 11 calendar months);
 - c. the total monthly PM₁₀ emissions for emissions unit P061, in tons;
 - d. the monthly PM₁₀ emissions averaged over the 12-month rolling period for emissions unit P061;
 - e. the total monthly PE for emissions unit P061, in tons; and
 - f. the rolling, 12-month summation of the total PE for emissions units P061 and P073, combined (the total PE for the current month, plus the total PE for the previous 11 calendar months).

(Authority for term: OAC rules 3745-31-05(D), 3745-31-05(A)(3), and 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 emission incident;
 - e. any corrective actions taken to minimize or eliminate the visible emissions;
 - f. the date and time the corrective action was completed; and
 - g. the names of the personnel who performed the work.

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

operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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.

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-17-07(A), and 40 CFR Part 64)

- (3) The permittee shall conduct an internal inspection of the cyclone controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following;
- a. a review of the structural integrity for all components of the cyclone;
 - b. inspection of the inside surfaces of the cyclone for deposits or blockages; and
 - c. an inspection of the bottom of the cyclone for plugging.

The permittee shall maintain records the following information for each inspection conducted:

- d. the date and time the inspection took place;
- e. the name and job title of the employee(s) conducting the inspection;
- f. a summary of any problems found during the inspection; and
- g. a listing of corrective actions taken, if any.

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.

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 40 CFR Part 64)

- (4) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions are the visible emissions observations of the cyclone stack and the cyclone inspections.

For visible emissions, the performance indicator is the presence or absence of visible emissions identified in d)(2). An excursion of this performance indicator is defined as any occasion when visible emissions are observed exiting the cyclone stack and are not deemed to be from normal operations.

The performance indicator for the cyclone is the result of the routine inspections specified in d)(3). An excursion of this performance indicator is defined as any occasion when a problem is detected with the structural integrity, material buildup, and/or operation of the cyclone.

When the visible emission observations indicate an excursion, and/or the cyclone inspection results detect an operational problem, corrective action (including, but not limited to, an evaluation of the emissions unit and cyclone) shall be assessed and implemented as appropriate.

Upon detecting an excursion, the owner or operator shall restore operation of the emissions unit (including the control devices) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range/parameter.

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

- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring 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)

- (6) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

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

- (7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0120516: d)(1) - d)(6). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month production rate limitation specified in c)(1);
 - b. all exceedances of the monthly PM₁₀ emission limitation averaged over the 12-month rolling period for emissions unit P061; and
 - c. all exceedances of the rolling, 12-month total PE limitation for emissions units P061 and P073, combined.

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 rules 3745-31-05(D), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (2) The permittee shall submit quarterly excursion reports that identify the following:
 - a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and the cause of each incident;
 - b. each inspection conducted in d)(3) that detected an operational or structural integrity problem and the cause of each incident;
 - c. the corrective action(s) taken for each incident described in (a) and (b);
 - d. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;
 - e. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance, was determined to be necessary and was not taken; and
 - f. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

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

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A)(1), 3745-31-05(A)(3), and 40 CFR Part 64)



- (3) If the permittee is required under 40 CFR Part 64.8 and d)(6) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

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

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0120516: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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. Control Requirement:

Install a cyclone control device associated with emissions unit P061 with a design control efficiency of at least 99% for PE.

Applicable Compliance Method:

The design control efficiency above is based on the permittee-supplied design estimate from the manufacturer as supplied in the application for PTI 14-3784, received January 1, 1995, and the subsequent application for PTI modification P0106724, received August 10, 2010.

No emissions tests are specifically required to demonstrate compliance with this design specification but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-5 from 40 CFR Part 60, Appendix A.

(Authority for term: ORC 3704.03(T), OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

b. Emission Limitation:

PM₁₀ emissions shall not exceed 0.10 ton per month, averaged over a twelve-month rolling period for emissions unit P061.

Applicable Compliance Method:

The annual PM₁₀ emission limitation above was calculated using the maximum annual production rate specified in b)(2)b. and the following equation:



$(30747.6 \text{ tons of product trimmed/yr}) \times (0.0770 \text{ ton of scrap/ton of product}^*) \times (0.05 \text{ ton of PM}_{10}\text{/ton of PE}^*) \times (1-0.99 \text{ cyclone control efficiency}^*) \times 1 \text{ yr}/12 \text{ months} = 0.10 \text{ ton/month of PM}_{10}$.

*Based on material balance, manufacturer control efficiencies, and emission information included with the application for PTI 14-3784, received January 1, 1995, and the subsequent application for PTI modification P0106724, received August 10, 2010.

Compliance shall be demonstrated using the actual production rate in the equation above and the associated record keeping specified in d)(1).

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

c. Emission Limitation:

The total PE from emissions units P061 and P073, combined, shall not exceed 23.72 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

The combined rolling, 12-month PE limitation was calculated using the maximum annual production rate restrictions specified in this permit for emissions units P061 and P073 and the following equations:

Emissions from Trim Line #5, P061

$(30,747.6 \text{ tons of product/year}) \times (0.077 \text{ ton of scrap/ton of product}^*) \times (1-0.99 \text{ cyclone control efficiency}^*) = 23.67 \text{ TPY PE}$.

Emissions from Sand Line #5, P073

$(28,380 \text{ tons of product/year}) \times (0.084 \text{ ton of scrap/ton of product}^*) \times (1-0.99 \text{ cyclone control efficiency}^*) \times (1-0.998 \text{ baghouse control efficiency}^*) = 0.05 \text{ TPY of PE}$.

The total combined PE = 23.67 TPY + 0.05 TPY = 23.72 TPY, based on a rolling, 12-month summation.

*Based on material balance, manufacturer control efficiencies, and emission information included with the application for PTI 14-3784, received January 1, 1995, and the subsequent application for PTI modification P0106724, received August 10, 2010.

Compliance shall be demonstrated using the actual production rates for emissions units P061 and P073 in the equations above and the associated record keeping specified in d)(1).

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))



d. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1)(a), 3745-17-07(A)(1), and 3745-77-07(C)(1))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0120516: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

8. P071, #3 Sanding Operation

Operations, Property and/or Equipment Description:

#3 Sanding Line with cyclone and baghouse

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(1) Table I	PE shall not exceed 9.01 pounds per hour.
c.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)a., (d)(1) - d)(6), e)(1), and e)(2).

(2) Additional Terms and Conditions

a. At all times, the permittee shall maintain the continuous monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the continuous monitoring equipment, in accordance with the proper maintenance requirements of CAM.

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions are the visible emissions observations of the baghouse stack, the pressure drop of the baghouse as measured and recorded by the continuous pressure drop monitoring system, and the cyclone inspections.

For visible emissions, the performance indicator is the presence or absence of visible emissions identified in d)(2). An excursion of this performance indicator is defined as any occasion when visible emissions are observed exiting the baghouse stack and are not deemed to be from normal operations.

The pressure drop performance indicator range is between 1 and 6 inches of water column across the baghouse and shall be demonstrated from the values recorded in d)(3). An excursion of this performance indicator is defined as any pressure drop value recorded in d)(3) outside this pressure drop range.

The performance indicator for the cyclone, which exhausts into the baghouse, is the result of the routine inspections specified in d)(4). An excursion of this performance indicator is defined as any occasion when a problem is detected with the structural integrity, material buildup, and/or operation of the cyclone.

When the visible emission observations indicate an excursion, the pressure drop values are outside the indicator range, and/or the cyclone inspection results detect an operational problem, corrective action (including, but not limited to, an evaluation of the emissions unit, monitoring equipment, baghouse, and cyclone) shall be assessed and implemented as appropriate.

Upon detecting an excursion, the owner or operator shall restore operation of the emissions unit (including the control devices) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range/parameter.

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

- (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 baghouse 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;
- e. any corrective actions taken to minimize or eliminate the visible emissions;
- f. the date and time the corrective action was completed; and
- g. the names of the personnel who performed the work.

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

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.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and 40 CFR Part 64)

- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The 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. The indicator range established for the pressure drop across the baghouse is between 1 and 6 inches of water. The permittee shall record the pressure drop across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop is outside the range established above, the permittee shall promptly investigate the cause of the excursion. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the excursion was first observed;
- b. the magnitude of the excursion 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 an excursion, 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 excursion 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 excursion ended;
- i. the total period of time (in minutes) during which there was an excursion;
- j. the pressure drop readings 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.

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

- (4) The permittee shall conduct an internal inspection of the cyclone controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following:
 - a. a review of the structural integrity for all components of the cyclone;
 - b. inspection of the inside surfaces of the cyclone for deposits or blockages; and
 - c. an inspection of the bottom of the cyclone for plugging.

The permittee shall maintain records the following information for each inspection conducted:

- d. the date and time the inspection took place;
- e. the name and job title of the employee(s) conducting the inspection;
- f. a summary of any problems found during the inspection; and
- g. a listing of corrective actions taken, if any.

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.

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

- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring 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)

- (6) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly excursion reports that identify the following:
- a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and the cause of each incident;
 - b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse(s) was outside of the range specified in d)(3) and the cause of each incident;
 - c. each inspection conducted in d)(4) that detected an operational or structural integrity problem and the cause of each incident;
 - d. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with QA/QC or other calibration checks) while the emissions unit was in operation and the cause of each incident;
 - e. the corrective action(s) taken for each incident described in (a), (b), and (c);



- f. an identification of each incident described in (a), (b), and (c) where a prompt investigation was not conducted;
- g. an identification of each incident described in (a), (b), and (c) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in d)(3) into an acceptable range, was determined to be necessary and was not taken; and
- h. an identification of each incident described in (a), (b), and (c) where proper records were not maintained for the investigation and/or the corrective action(s).

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

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A), and 40 CFR Part 64)

- (2) If the permittee is required under 40 CFR Part 64.8 and d)(6) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

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

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 stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1)(a), 3745-17-07(A), and 3745-77-07(C)(1))



b. Emission Limitation:

PE shall not exceed 9.01 pounds per hour.

Applicable Compliance Method:

The hourly PE rate above is based on Table I in OAC rule 3745-17-11 using the maximum process weight rate of 6479 lbs/hour for the emissions unit. This emission limitation is greater than the controlled potential to emit calculated using the following equation:

$$6479 \text{ pounds/hr maximum processing rate} \times (0.084 \text{ lb scrap/lb of product}^*) \times (1 - 0.99 \text{ cyclone control efficiency}^*) \times (1 - 0.998 \text{ baghouse control efficiency}^*) = 0.011 \text{ pound PE/hour}$$

*Based on material balance, manufacturer control efficiencies, and emission information included with the prior permit applications, submitted 3/4/83 (formerly part of P025), and the Title V application, submitted 12/29/2015.

No emissions tests are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-5 from 40 CFR Part 60, Appendix A.

(Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) None.

9. P072, #4 Sanding Operation

Operations, Property and/or Equipment Description:

#4 Sanding Line with baghouse

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-2783, issued 9/30/1992)	See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(1)	The hourly PE limitation established by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)b., d)(1) - d)(5), and e)(1) – e)(2).

(2) Additional Terms and Conditions

a. The PE and PM₁₀ emissions from emissions units P060 and P072, combined, shall not exceed the following:

1.2 lbs. of PE/hour* and 0.9 lb. of PM₁₀/hour*; and



5.27 TPY of PE* and 3.94 TPY of PM₁₀*.

Emissions units P060 (trim line) and P072 (sand line) are operationally united. They have individual control devices and combined emission limitations.

*The PE and PM₁₀ emission limitations established in PTI 14-2783 were based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.

- b. At all times, the permittee shall maintain the continuous monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the continuous monitoring equipment, in accordance with the proper maintenance requirements of CAM.

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

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions are the visible emissions observations of the baghouse stack and the pressure drop of the baghouse as measured and recorded by the continuous pressure drop monitoring system.

For visible emissions, the performance indicator is the presence or absence of visible emissions identified in d)(2). An excursion of this performance indicator is defined as any occasion when visible emissions are observed exiting the baghouse stack and are not deemed to be from normal operations.

The pressure drop performance indicator range is between 1 and 6 inches of water column across the baghouse and shall be demonstrated from the values recorded in d)(3). An excursion of this performance indicator is defined as any pressure drop value recorded in d)(3) outside this pressure drop range.

When the visible emission observations indicate an excursion and/or the pressure drop values are outside the indicator range, corrective action (including, but not limited to, an evaluation of the emissions unit, monitoring equipment, and baghouse) shall be assessed and implemented as appropriate.

Upon detecting an excursion, the owner or operator shall restore operation of the emissions unit (including the control devices) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to

normal without operator action (such as thorough response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range/parameter.

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

- (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 baghouse 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;
 - e. any corrective actions taken to minimize or eliminate the visible emissions;
 - f. the date and time the corrective action was completed; and
 - g. the names of the personnel who performed the work.

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

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.

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A), 3745-31-05(A)(3), and 40 CFR Part 64)

- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The 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. The indicator range established for

the pressure drop across the baghouse is between 1 and 6 inches of water. The permittee shall record the pressure drop across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop is outside the range established above, the permittee shall promptly investigate the cause of the excursion. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the excursion was first observed;
- b. the magnitude of the excursion 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 an excursion, 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 excursion 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 excursion ended;
- i. the total period of time (in minutes) during which there was an excursion;
- j. the pressure drop readings 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.

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

- (4) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the

monitoring of additional parameters. Approved revisions to the monitoring 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)

- (5) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

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

- (6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-2783: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

- (1) The permittee shall submit quarterly excursion reports that identify the following:
- a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and the cause of each incident;
 - b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse(s) was outside of the range specified in d)(3) and the cause of each incident;
 - c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with QA/QC or other calibration checks) while the emissions unit was in operation and the cause of each incident;
 - d. the corrective action(s) taken for each incident described in (a) and (b);
 - e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;
 - f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in d)(3) into an acceptable range, was determined to be necessary and was not taken; and
 - g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

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

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-17-07(A), and 40 CFR Part 64)

- (2) If the permittee is required under 40 CFR Part 64.8 and d)(5) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

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

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-2783: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1)(a), 3745-17-07(A)(1), 3745-31-05(A)(3), and 3745-77-07(C)(1))

b. **Emission Limitations:**

The total PE and PM₁₀ emissions from emissions units P060 and P072, combined, shall not exceed the following:

1.2 lbs. of PE/hour and 0.9 lb. of PM₁₀/hour; and



5.27 TPY of PE and 3.94 TPY of PM₁₀.

Applicable Compliance Method:

The short-term (lb/hour) PE and PM₁₀ emission limitations above represent the controlled potential to emit and were calculated using the following equations:

Emissions from Trim Line #4, P060

276.3 pounds/hr maximum scrap rate* x (1-0.999 cyclone control efficiency*) = 0.3 pound PE/hour

Emissions from Sanding Line #4, P072

450 pounds/hr maximum scrap rate* x (1-0.998 baghouse control efficiency*) = 0.9 pound PE/PM₁₀/hour

Total PE = 0.3 lb/hr + 0.9 lb/hr = 1.2 lbs/hour for P061 and P072, combined

Total PM₁₀ = 0.9 lb/hr for P061 and P072, combined

*Based on material balance, manufacturer control efficiencies, and emission information included with the application for PTI 14-2783, submitted on 8/24/92 (formerly identified as P001). The PM₁₀ emission limitations assume all the trimmer emissions are greater than 10 microns in diameter, and all the sander emissions are less than 10 microns in diameter as provided in the PTI application.

The combined ton per year emission limitations were developed by multiplying the short-term PE and PM₁₀ emission rates (1.2 lb/hr and 0.9 lb/hr, respectively) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitations, compliance shall also be shown with the annual emission limitations.

No emissions tests are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-5 from 40 CFR Part 60, Appendix A.

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

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-2783: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
- g) Miscellaneous Requirements
 - (1) None.



10. P073, #5 Sanding Operation

Operations, Property and/or Equipment Description:

#5 Sanding Line with cyclone and baghouse

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) and OAC rule 3745-31-03(A)(3) (PTI #P0120516, issued 6/6/2016)	Install cyclone and baghouse control devices associated with emissions unit P073 with a design control efficiency of at least 99% and 99.8%, respectively, for PE.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	PM ₁₀ emissions shall not exceed 0.004 ton per month averaged over a twelve-month rolling period for emissions unit P073. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/06	Best Available Technology (BAT) exemption. See b)(2)b.
d.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Prevention of Significant Deterioration (PSD)	The total PE from emissions units P061 and P073, combined, shall not exceed 23.72 TPY, based on a rolling, 12-month summation. See c)(1).
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-11(B)(1)	The hourly particulate emission limitation established by this rule is less stringent than the maximum calculated hourly controlled PE limitation using the control efficiency established pursuant to ORC 3704.03(T) and OAC rule 3745-31-05(A)(3) in b)(1)a.
g.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)c., d)(2) - d)(7), and e)(2) – e)(3).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the 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 3745-31-05, then these emission limits/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 State Implementation Plan:

Permit to Install and Operate P0120516 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. the PM₁₀ emissions from emissions unit P073 shall be vented to the cyclone and baghouse with a minimum control efficiency of at least 99% and 99.8%, respectively, at all times when emissions unit P073 is in operation; and
- ii. the amount of product sanded/processed in emissions unit P073 shall not exceed 28,380 tons per year.

- c. At all times, the permittee shall maintain the continuous monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the continuous monitoring equipment, in accordance with the proper maintenance requirements of CAM.

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

c) Operational Restrictions

- (1) The maximum annual production rate for emissions unit P073 shall not exceed 28,380 tons per year, based upon a rolling, 12-month summation of the production rates.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall calculate and maintain monthly records of the following information:
 - a. the production rate for emissions unit P073, in tons;
 - b. the rolling, 12-month summation of the production rates for emissions unit P073 (the total production rate for the current month, plus the total production rate for the previous 11 calendar months);
 - c. the total monthly PM₁₀ emissions for emissions unit P073, in tons;
 - d. the monthly PM₁₀ emissions averaged over the 12-month rolling period for emissions unit P073;
 - e. the total monthly PE for emissions unit P073, in tons; and
 - f. the rolling, 12-month summation of the total PE for emissions units P061 and P073, combined (the total PE for the current month, plus the total PE for the previous 11 calendar months).

(Authority for term: OAC rules 3745-31-05(D), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions are the visible emissions observations of the baghouse stack, the pressure drop of the baghouse as measured and recorded by the continuous pressure drop monitoring system, and the cyclone inspections.

For visible emissions, the performance indicator is the presence or absence of visible emissions identified in d)(3). An excursion of this performance indicator is defined as any occasion when visible emissions are observed exiting the baghouse stack and are not deemed to be from normal operations.

The pressure drop performance indicator range is between 1 and 6 inches of water column across the baghouse and shall be demonstrated from the values recorded in

d)(4). An excursion of this performance indicator is defined as any pressure drop value recorded in d)(4) outside this pressure drop range.

The performance indicator for the cyclone, which exhausts into the baghouse, is the result of the routine inspections specified in d)(5). An excursion of this performance indicator is defined as any occasion when a problem is detected with the structural integrity, material buildup, and/or operation of the cyclone.

When the visible emission observations indicate an excursion, the pressure drop values are outside the indicator range, and/or the cyclone inspection results detect an operational problem, corrective action (including, but not limited to, an evaluation of the emissions unit, monitoring equipment, baghouse, and cyclone) shall be assessed and implemented as appropriate.

Upon detecting an excursion, the owner or operator shall restore operation of the emissions unit (including the control devices) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range/parameter.

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

- (3) 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 baghouse 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;
 - e. any corrective actions taken to minimize or eliminate the visible emissions;
 - f. the date and time the corrective action was completed; and
 - g. the names of the personnel who performed the work.

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

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

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.

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-17-07(A), and 40 CFR Part 64)

- (4) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The 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. The indicator range established for the pressure drop across the baghouse is between 1 and 6 inches of water. The permittee shall record the pressure drop across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop is outside the range established above, the permittee shall promptly investigate the cause of the excursion. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the excursion was first observed;
- b. the magnitude of the excursion 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 an excursion, 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 excursion 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 excursion ended;
- i. the total period of time (in minutes) during which there was an excursion;

- j. the pressure drop readings 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.

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

- (5) The permittee shall conduct an internal inspection of the cyclone controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following:
 - a. a review of the structural integrity for all components of the cyclone;
 - b. inspection of the inside surfaces of the cyclone for deposits or blockages; and
 - c. an inspection of the bottom of the cyclone for plugging.

The permittee shall maintain records the following information for each inspection conducted:

- d. the date and time the inspection took place;
- e. the name and job title of the employee(s) conducting the inspection;
- f. a summary of any problems found during the inspection; and
- g. a listing of corrective actions taken, if any.

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.

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

- (6) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring 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)

- (7) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

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

- (8) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0120516: d)(1) - d)(7). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month production rate limitation specified in c)(1);
 - b. all exceedances of the monthly PM₁₀ emission limitation averaged over the 12-month rolling period for emissions unit P073; and
 - c. all exceedances of the rolling, 12-month total PE limitation for emissions units P061 and P073, combined.

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 rules 3745-31-05(D), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (2) The permittee shall submit quarterly excursion reports that identify the following:
- a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and the cause of each incident;
 - b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse(s) was outside of the range specified in d)(4) and the cause of each incident;
 - c. each inspection conducted in d)(5) that detected an operational or structural integrity problem and the cause of each incident;
 - d. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with QA/QC or other calibration checks) while the emissions unit was in operation and the cause of each incident;

- e. the corrective action(s) taken for each incident described in (a), (b), and (c);
- f. an identification of each incident described in (a), (b), and (c) where a prompt investigation was not conducted;
- g. an identification of each incident described in (a), (b), and (c) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in d)(4) into an acceptable range, was determined to be necessary and was not taken; and
- h. an identification of each incident described in (a), (b), and (c) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly 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)

- (3) If the permittee is required under 40 CFR Part 64.8 and d)(7) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

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

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0120516: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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. Control Requirement:

Install cyclone and baghouse control devices associated with emissions unit P073 with a design control efficiency of at least 99% and 99.8%, respectively, for PE.

Applicable Compliance Method:

The design control efficiencies above are based on the permittee-supplied design estimate from the manufacturer as supplied in the application for PTI 14-3784, received January 1, 1995, and the subsequent application for PTI modification P0106724, received August 10, 2010.



No emissions tests are specifically required to demonstrate compliance with this design specification but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-5 from 40 CFR Part 60, Appendix A.

(Authority for term: ORC 3704.03(T), OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

b. Emission Limitation:

PM₁₀ emissions shall not exceed 0.004 ton per month averaged over a twelve-month rolling period for emissions unit P073.

Applicable Compliance Method:

The annual PM₁₀ emission limitation above was calculated using the maximum annual production rate specified in b)(2)b. and the following equation:

$(28,380 \text{ tons of product sanded/year}) \times (0.084 \text{ ton of scrap/ton of product sanded}^*) \times (0.238 \text{ ton of PM}_{10}\text{/ton of PE}^*) \times (1-0.99 \text{ cyclone control efficiency}^*) \times (1-0.998 \text{ baghouse control efficiency}^*) \times 1 \text{ yr}/12 \text{ months} = 0.004 \text{ ton/month of PM}_{10}.$

*Based on material balance, manufacturer control efficiencies, and emission information included with the application for PTI 14-3784, received January 1, 1995, and the subsequent application for PTI modification P0106724, received August 10, 2010.

Compliance shall be demonstrated using the actual production rate in the equation above and the associated record keeping specified in d)(1).

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

c. Emission Limitation:

The total PE from emissions units P061 and P073, combined, shall not exceed 23.72 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:

The combined rolling, 12-month PE limitation was calculated using the maximum annual production rate restrictions specified in this permit for emissions units P061 and P073 and the following equations:

Emissions from Trim Line #5, P061

$(30,747.6 \text{ tons of product/year}) \times (0.077 \text{ ton of scrap/ton of product}^*) \times (1-0.99 \text{ cyclone control efficiency}^*) = 23.67 \text{ TPY PE.}$



Emissions from Sand Line #5, P073

$(28,380 \text{ tons of product/year}) \times (0.084 \text{ ton of scrap/ton of product}^*) \times (1 - 0.99 \text{ cyclone control efficiency}^*) \times (1 - 0.998 \text{ baghouse control efficiency}^*) = 0.05 \text{ TPY of PE.}$

The total combined PE = 23.67 TPY + 0.05 TPY = 23.72 TPY, based on a rolling, 12-month summation.

*Based on material balance, manufacturer control efficiencies, and emission information included with the application for PTI 14-3784, received January 1, 1995, and the subsequent application for PTI modification P0106724, received August 10, 2010.

Compliance shall be demonstrated using the actual production rates for emissions units P061 and P073 in the equations above and the associated record keeping specified in d)(1).

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

d. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1)(a), 3745-17-07(A)(1), and 3745-77-07(C)(1))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0120516: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

11. Emissions Unit Group - Boilers - Gas/Oil: B008, B009, B010

EU ID	Operations, Property and/or Equipment Description
B008	73.5 MMBtu/hr natural gas and No. 2 fuel oil-fired boiler #1 (previously B001 in PTI 14-4755 under PN 1431154026)
B009	73.5 MMBtu/hr natural gas and No. 2 fuel oil-fired boiler #2 (previously B002 in PTI 14-4755 under PN 1431154026)
B010	73.5 MMBtu/hr natural gas and No. 2 fuel oil-fired boiler #3 (previously B003 in PTI 14-4755 under PN 1431154026)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #P0119134, issued 9/16/2015)	<p>When burning natural gas, emissions shall not exceed the following:</p> <p>0.008 lb. PE per MMBtu actual heat input;</p> <p>0.008 lb. PM₁₀ per MMBtu actual heat input;</p> <p>0.0006 lb. SO₂ per MMBtu actual heat input;</p> <p>0.05 lb. NO_x per MMBtu actual heat input;</p> <p>0.08 lb. CO per MMBtu actual heat input;</p> <p>and</p> <p>0.005 lb. VOC per MMBtu actual heat input.</p> <p>When burning No. 2 fuel oil, emissions shall not exceed the following:</p> <p>0.328 lb. SO₂ per MMBtu actual heat input;</p> <p>0.15 lb. NO_x per MMBtu actual heat</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>input;</p> <p>0.04 lb. CO per MMBtu actual heat input; and</p> <p>0.002 lb. VOC per MMBtu actual heat input.</p> <p>Emissions from emissions units B008, B009, and B010, combined, shall not exceed the following, based on a rolling, 12-month summation of the monthly emissions:</p> <p>9.1 TPY PE;</p> <p>9.1 TPY PM₁₀;</p> <p>85.6 TPY CO; and</p> <p>5.5 TPY VOC.</p> <p>See c)(2).</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B)(1), 3745-31-05(D), and 40 CFR Part 60, Subpart Dc.</p>
b.	OAC rule 3745-17-07(A)(1)	The visible emission limitations specified by this rule are less stringent than the visible emission limitations established pursuant to 40 CFR Part 60, Subpart Dc.
c.	OAC rule 3745-17-10(B)(1)	<p>PE shall not exceed 0.020 lb. per MMBtu actual heat input when burning No. 2 fuel oil.</p> <p>When burning natural gas, the PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
d.	OAC rule 3745-18-06	The SO ₂ emission limitations specified by this rule are less stringent than the SO ₂ emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Prevention	Emissions of SO ₂ from emissions units B008, B009, and B010, combined, shall not exceed 38.7 TPY, based on a rolling,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	of Significant Deterioration (PSD)	12-month summation of the monthly emissions. See c)(3) and c)(4).
f.	OAC rule 3745-31-05(D) Netting to avoid Prevention of Significant Deterioration (PSD)	NOx emissions from emissions units B008, B009, and B010, combined, shall not exceed 66.2 TPY, based on a rolling, 12-month summation of the monthly emissions. See c)(2), c)(3), and c)(4).
g.	40 CFR Part 60, Subpart Dc (40 CFR 60.40c – 60.48c) Standards of Performance (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units	Excluding periods of startup, shutdown, or malfunction, visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except for one six-minute period per hour of not more than 27% opacity. The SO ₂ emission limitations specified by this rule are less stringent than the SO ₂ emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
h.	40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480-7575) National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters [In accordance with 63.7490 and 63.7499, the emissions unit is an existing boiler that commenced construction prior to 6/4/2010 (installation commenced 9/1/1999), designed to burn Gas 1 fuels and is subject to the work practice standards specified in this rule. The permittee has committed to complying with the definition in 63.7575 for the Gas 1 subcategory, including burning No. 2 fuel oil only during periods of natural gas curtailment.]	Table 3 to 40 CFR Part 63, Subpart DDDDD – Work Practice Standards [40 CFR 63.7500]. See c)(5).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
i.	40 CFR Part 63.1-15, Subpart A (40 CFR 63.7565)	Table 10 to 40 CFR Part 63, Subpart DDDDD – Applicability of General Provisions (Subpart A) to Subpart DDDDD shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.

(2) Additional Terms and Conditions

a. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

c) Operational Restrictions

(1) The quality of the oil burned in the emissions unit shall meet the following specifications on an "as received" basis:

- a. a sulfur content which is sufficient to comply with the allowable SO₂ emission limitation of 0.328 pound of SO₂/ MMBtu actual heat input; and
- b. greater than 130,000 Btu/gallon of oil.

Compliance with the above-mentioned specifications shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

(2) The permittee shall install, operate and maintain low-NOx burners at all times when operating emissions units B008, B009, and B010.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D), and 3745-77-07(A)(1))

(3) The maximum annual No. 2 fuel oil usage for emissions units B008, B009, and B010, combined, shall not exceed 1,790,000 gallons per year based upon a rolling, 12-month summation of the No. 2 fuel oil usage figures.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D), and 3745-77-07(A)(1))

(4) The permittee shall only burn natural gas and/or No. 2 fuel oil in emissions units B008, B009, and B010.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D), and 3745-77-07(A)(1))

- (5) The permittee shall comply with the applicable work practices required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7500, 63.7515(d), 63.7540, and Table 3 to Subpart DDDDD	annual tune-up requirements
63.7500 and Table 3 to Subpart DDDDD	one-time energy assessment requirements
63.7500(a)(3)	general duty to minimize emissions

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart DDDDD)

d) Monitoring and/or Recordkeeping Requirements

- (1) For each shipment of oil received for burning in the emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-18-04, and 3745-77-07(C)(1))

- (2) The permittee shall maintain monthly records of the following information for emissions units B008, B009, and B010, combined:
- a. the total natural gas usage rate for each month;
 - b. the total No. 2 fuel oil usage rate for each month;
 - c. the monthly emissions of PE, PM₁₀, SO₂, NO_x, CO and VOC, in tons [calculated based on the fuel-specific emission factors as outlined in f)];
 - d. the rolling, 12-month summation of the No. 2 fuel oil usage (the summation of d)(2)b. for the current month's total and previous 11-months totals);

- e. the rolling, 12-month emissions of PE, PM₁₀, SO₂, NO_x, CO and VOC, in tons.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D), and 3745-77-07(C)(1))

- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart Dc, including the following sections:

60.46c(e)	Fuel supplier certification(s) and statement(s) for oil
60.47c(c)	COMs exemption [See d)(4) and d)(5) below]
60.48c(f)	Fuel supplier certification(s) and statement(s) for oil
60.48c(g)(1) or (2) or (3)	Fuel usage records
60.48c(i)	Records retention

(Authority for term: 40 CFR Part 60, Subpart Dc, OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (4) For steam generating units with a heat input capacity \geq 30 MMBtu /hour, where meeting the requirements (one of the options) of 40 CFR 60.47c(c), (d), (e), or (f), Method 9 of Appendix A of Part 60 may be used in accordance with the procedures in 40 CFR 60.11, to demonstrate compliance with the opacity standard. The following records shall be maintained for visible emissions readings:

- a. the dates and time intervals of all opacity observation periods;
- b. the name, affiliation, and copy of current visible emission reading certification for each visible emission observer participating in the performance test; and
- c. copies of all visible emission observer opacity field data sheets.

(Authority for term: 40 CFR 60.48c(c), OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (5) If meeting the requirements of 40 CFR 60.47c(c), (d), (e), or (f), the permittee may conduct performance tests using Method 9 of Appendix A to Part 60 and the procedures in 40 CFR 60.11. The following schedule shall be followed for visible emission observations, as determined by the most recent Method 9 performance test results:

- a. If no visible emissions are observed, a subsequent Method 9 performance test must be completed within 12 calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later;
- b. If visible emissions are observed but the maximum 6-minute average opacity is less than or equal to 5%, a subsequent Method 9 performance test must be completed within 6 calendar months from the date that the most recent



Effective Date: To be entered upon final issuance

performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later;

- c. If the maximum 6-minute average opacity is greater than 5% but less than or equal to 10%, a subsequent Method 9 performance test must be completed within 3 calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later; or
- d. If the maximum 6-minute average opacity is greater than 10%, a subsequent Method 9 performance test must be completed within 45 calendar days from the date that the most recent performance test was conducted.

If during the initial 60 minutes of the observation all the 6-minute averages are less than 10% opacity and all the individual 15-second observations are less than or equal to 20%, then the observation period may be reduced from 3 hours to 60 minutes.

(Authority for term: 40 CFR 60.47c, OAC rules 3745-31-05(A)(3) and 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 DDDDD, including the following sections:

63.7555	required overall records to be maintained
63.7560	record format and retention requirements

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD)

- (7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0119134: d)(1) - d)(6). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any exceedance of the emission limitations specified in b)(1)a., b)(1)c., b)(1)e., b)(1)f.;
 - b. any exceedance of the No. 2 fuel oil usage limitation in c)(3);
 - c. any deviation from No. 2 fuel oil sulfur content limitation or the minimum Btu/gallon heat content limitation of the fuel oil in c)(1); and

- d. any deviation from the fuel restriction in c)(4).

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 rules 3745-31-05(A)(3), 3745-31-05(D), 3745-17-10(B), and 3745-77-07(C)(1))

- (2) The permittee shall submit semi-annual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 60, Subpart Dc, per the following sections:

60.48c(b)	Initial and/or subsequent performance test reports
60.48c(c)	Opacity excess emissions report requirements
60.48c(d) - (e)	Compliance report requirements
60.48c(j)	Reporting period

(Authority for term: 40 CFR Part 60, Subpart Dc, OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

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

63.7530(e) - (f) and 63.7545	Notification of Compliance Status requirements
63.7550 and Table 9 to Subpart DDDDD	content and submission of compliance reports

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD)

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0119134: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

0.008 lb. PE per MMBtu actual heat input when burning natural gas

0.008 lb. PM₁₀ per MMBtu actual heat input when burning natural gas

0.020 lb. PE per MMBtu actual heat input when burning No. 2 fuel oil

Applicable Compliance Methods:

When burning natural gas, compliance may be determined by multiplying the hourly gas burning capacity of each emissions unit (73,500 cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 7.6 lbs of PE per million cubic feet, and dividing by the maximum hourly heat input capacity of each emissions unit (73.5 MMBtu/hr), then dividing by one million.

When burning No. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of each emissions unit (528 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-6 for industrial boilers (revised 5/10) emission factor of 2 lbs of PE per 1000 gallons of fuel, and dividing by the maximum hourly heat input capacity of each emissions unit (73.5 MMBtu/hr), then dividing by one thousand.

All PE is assumed to be PM₁₀.

No emissions tests are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-5 from 40 CFR Part 60, Appendix A.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-17-10(B), and 3745-77-07(C)(1))

b. Emission Limitations:

0.0006 lb. SO₂ per MMBtu actual heat input when burning natural gas

0.328 lb. SO₂ per MMBtu actual heat input when burning No. 2 fuel oil

Applicable Compliance Methods:

When combusting natural gas, compliance may be determined by multiplying the hourly gas burning capacity of each emissions unit (73,500 cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lbs of SO₂ per million cubic feet, and dividing by the maximum hourly heat input capacity of the emissions unit (73.5 MMBtu/hr), then dividing by one million.

Compliance with the SO₂ emission limitation for fuel oil shall be demonstrated by the fuel analysis and recordkeeping requirements specified in d)(1).

No emissions tests are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-4 and 6 from 40 CFR Part 60, Appendix A.

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

c. Emission Limitations:

0.05 lb. NO_x per MMBtu actual heat input when burning natural gas

0.15 lb. NO_x per MMBtu actual heat input when burning No. 2 fuel oil

Applicable Compliance Methods:

When burning natural gas, compliance may be determined by multiplying the hourly gas burning capacity of each emissions unit (73,500 cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 50 lbs of NO_x per million cubic feet, and dividing by the maximum hourly heat input capacity of each emissions unit (73.5 MMBtu/hr), then dividing by one million.

When burning No. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of each emissions unit (528 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 20 lbs of NO_x per 1000 gallons of fuel, and dividing by the maximum hourly heat input capacity of each emissions unit (73.5 MMBtu/hr), then dividing by one thousand.

No emissions tests are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-4 and 7 from 40 CFR Part 60, Appendix A.

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

d. Emission Limitations:

0.08 lb. CO per MMBtu actual heat input when burning natural gas

0.04 lb. CO per MMBtu actual heat input when burning No. 2 fuel oil

Applicable Compliance Methods:

When burning natural gas, compliance may be determined by multiplying the hourly gas burning capacity of each emissions unit (73,500 cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 84 lbs of CO per million cubic feet, and dividing by the maximum hourly heat input capacity of each emissions unit (73.5 MMBtu/hr), then dividing by one million.

When burning No. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of each emissions unit (528 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 5 lbs of



CO per 1000 gallons of fuel, and dividing by the maximum hourly heat input capacity of each emissions unit (73.5 MMBtu/hr), then dividing by one thousand.

No emissions tests are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-4 and 10 from 40 CFR Part 60, Appendix A.

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

e. Emission Limitations:

0.005 lb. VOC per MMBtu actual heat input when burning natural gas

0.002 lb. VOC per MMBtu actual heat input when burning No. 2 fuel oil

Applicable Compliance Methods:

When burning natural gas, compliance may be determined by multiplying the hourly gas burning capacity of each emissions unit (73,500 cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 5.5 lbs of VOC per million cubic feet, and dividing by the maximum hourly heat input capacity of each emissions unit (73.5 MMBtu/hr), then dividing by one million.

When burning No. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of each emissions unit (528 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-3 (revised 5/10) emission factor of 0.252 lbs of VOC per 1000 gallons of fuel, and dividing by the maximum hourly heat input capacity of each emissions unit (73.5 MMBtu/hr), then dividing by one thousand.

No emissions tests are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-4 and 25 from 40 CFR Part 60, Appendix A.

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

f. Emission Limitations:

9.1 TPY PE*;

9.1 TPY PM₁₀ emissions*;

38.7 TPY SO₂ emissions*;

66.2 TPY NO_x emissions*;

85.6 TPY CO emissions*; and

5.5 TPY VOC emissions*.



Effective Date: To be entered upon final issuance

*as rolling, 12-month summations of the monthly emissions for emissions units B008, B009, and B010, combined.

Applicable Compliance Method:

When combusting natural gas, the annual emission limitations above are equivalent to, or greater than, the potential to emit of all the emissions units, combined, assuming 8,760 hours per year of operation. When combusting fuel oil, compliance with the emission limitations above is assured through compliance with the annual fuel oil limitation in c)(3).

Compliance with the rolling, 12-month NO_x, CO, PE, PM₁₀, VOC, and SO₂ emission limitations shall be demonstrated based on the record keeping in d)(1) and d)(2).

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D), and 3745-77-07(C)(1))

g. Emission Limitation:

Visible particulate emissions from the stack serving the emissions unit shall not exceed 20 percent opacity as a six-minute average, except for one 6-minute period per hour of not more than 27 percent opacity.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the opacity standard in accordance with 40 CFR 60.45c and 60.47c, as identified in the Monitoring and Recordkeeping section of this permit.

(Authority for term: 40 CFR Part 60, Subpart Dc, OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0119134: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

12. Emissions Unit Group - Sand Lines: P075, P077

EU ID	Operations, Property and/or Equipment Description
P075	#6 Sanding Line, equipped with cyclone and baghouse
P077	#7 Sanding Line, equipped with cyclone and baghouse

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI #P0121264, issued 8/23/2016)	PE shall not exceed 0.01 pound per hour and 0.05 TPY. PM ₁₀ emissions shall not exceed 0.003 pound per hour and 0.01 TPY. See b)(2)a. and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	Best Available Technology (BAT) exemption. See b)(2)b.
c.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)b.i.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(1) Table I	PE shall not exceed 9.01 pounds per hour.
f.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See b)(2)d., (d)(1) - d)(6), e)(1), and e)(2).

(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 State Implementation Plan:

Permit to Install P0121264 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, such that the potential to emit of each pollutant is less than 10 tons per year for the purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. the PE and PM₁₀ emissions from emissions units P075 and P077 shall be vented to a cyclone and baghouse with a minimum control efficiency of at least 99% and 99.8%, respectively, at all times when the emissions units are in operation.
- c. The hourly and annual PE and PM₁₀ emissions limits were established to reflect the potential to emit for the emissions unit, assuming 8,760 hours of operation per year. Therefore, it is not necessary to develop PE or PM₁₀ record keeping and/or reporting requirements to demonstrate compliance with these emission limitations.
- d. At all times, the permittee shall maintain the continuous monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the continuous monitoring equipment, in accordance with the proper maintenance requirements of CAM.

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

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions are the visible emissions observations of the baghouse stack, the pressure drop of the baghouse as measured and recorded by the continuous pressure drop monitoring system, and the cyclone inspections.

For visible emissions, the performance indicator is the presence or absence of visible emissions identified in d)(2). An excursion of this performance indicator is defined as any occasion when visible emissions are observed exiting the baghouse stack and are not deemed to be from normal operations.

The pressure drop performance indicator range is between 1 and 6 inches of water column across the baghouse and shall be demonstrated from the values recorded in d)(3). An excursion of this performance indicator is defined as any pressure drop value recorded in d)(3) outside this pressure drop range.

The performance indicator for the cyclone, which exhausts into the baghouse, is the result of the routine inspections specified in d)(4). An excursion of this performance indicator is defined as any occasion when a problem is detected with the structural integrity, material buildup, and/or operation of the cyclone.

When the visible emission observations indicate an excursion, the pressure drop values are outside the indicator range, and/or the cyclone inspection results detect an operational problem, corrective action (including, but not limited to, an evaluation of the emissions unit, monitoring equipment, baghouse, and cyclone) shall be assessed and implemented as appropriate.

Upon detecting an excursion, the owner or operator shall restore operation of the emissions unit (including the control devices) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range/parameter.

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

- (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 baghouse 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;
- e. any corrective actions taken to minimize or eliminate the visible emissions;
- f. the date and time the corrective action was completed; and
- g. the names of the personnel who performed the work.

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

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.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64)

- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The 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. The indicator range established for the pressure drop across the baghouse is between 1 and 6 inches of water. The permittee shall record the pressure drop across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop is outside the range established above, the permittee shall promptly investigate the cause of the excursion. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the excursion was first observed;
- b. the magnitude of the excursion 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 an excursion, 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 excursion 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 excursion ended;
- i. the total period of time (in minutes) during which there was an excursion;
- j. the pressure drop readings 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.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64)

- (4) The permittee shall conduct an internal inspection of the cyclone controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following:
 - a. a review of the structural integrity for all components of the cyclone;
 - b. inspection of the inside surfaces of the cyclone for deposits or blockages; and
 - c. an inspection of the bottom of the cyclone for plugging.

The permittee shall maintain records the following information for each inspection conducted:

- d. the date and time the inspection took place;
- e. the name and job title of the employee(s) conducting the inspection;
- f. a summary of any problems found during the inspection; and
- g. a listing of corrective actions taken, if any.

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.

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

- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring 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)

- (6) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

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

- (7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0121264: d)(1) - d)(6). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly excursion reports that identify the following:
- a. all days during which any abnormal visible particulate emissions were observed from the baghouse stack serving the emissions unit and the cause of each incident;
 - b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse(s) was outside of the range specified in d)(3) and the cause of each incident;

- c. each inspection conducted in d)(4) that detected an operational or structural integrity problem and the cause of each incident;
- d. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with QA/QC or other calibration checks) while the emissions unit was in operation and the cause of each incident;
- e. the corrective action(s) taken for each incident described in (a), (b), and (c);
- f. an identification of each incident described in (a), (b), and (c) where a prompt investigation was not conducted;
- g. an identification of each incident described in (a), (b), and (c) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in d)(3) into an acceptable range, was determined to be necessary and was not taken; and
- h. an identification of each incident described in (a), (b), and (c) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly 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), OAC rule 3745-17-07(A), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64)

- (2) If the permittee is required under 40 CFR Part 64.8 and d)(6) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

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

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0121264: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:**

PE shall not exceed 0.01 pound per hour and 0.05 TPY.



Applicable Compliance Method:

The short-term PE limitation above represents the controlled potential to emit and was calculated using the following equation:

$$6479 \text{ lbs/hr maximum processing rate} \times 0.084 \text{ lb scrap/lb of product}^* \times (1-0.99 \text{ cyclone control efficiency}^*) \times (1-0.998 \text{ baghouse control efficiency}^*) = 0.01 \text{ lb PE/hour}$$

*Based on material balance, manufacturer control efficiencies, and emission information included with the applications for PTI 14-05975, submitted on 8/10/2007, and PTI 14-05994, submitted on 10/12/2007.

The ton per year emission limitation was developed by multiplying the short-term allowable PE limitation (0.01 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

No emissions tests are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-5 from 40 CFR Part 60, Appendix A.

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

b. Emission Limitations:

PM₁₀ emissions shall not exceed 0.003 pound per hour and 0.01 TPY.

Applicable Compliance Method:

The short-term PM₁₀ limitation above represents the controlled potential to emit and was calculated using the following equation:

$$6479 \text{ pounds/hr maximum processing rate} \times 0.084 \text{ lb scrap/lb of product}^* \times 23.8\% \text{ PM}_{10} \text{ emission factor}^* \times (1-0.99 \text{ cyclone control efficiency}^*) \times (1-0.998 \text{ baghouse control efficiency}^*) = 0.003 \text{ pound PM}_{10}/\text{hour}$$

*Based on material balance, manufacturer control efficiencies, and emission information included with the applications for PTI 14-05975, submitted on 8/10/2007, and PTI 14-05994, submitted on 10/12/2007.

The ton per year emission limitation was developed by multiplying the short-term allowable PM₁₀ limitation (0.003 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

No emissions tests are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-4 and 201 from 40 CFR Part 60, Appendix A.



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

c. Emission Limitation:

PE shall not exceed 9.01 pounds per hour.

Applicable Compliance Method:

The hourly PE rate above is based on Table I in OAC rule 3745-17-11 using the maximum process weight rate of 6479 lbs/hour for the emissions unit. This emission limitation is greater than the controlled potential to emit as calculated above in f)(1)a. No emissions tests are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-5 from 40 CFR Part 60, Appendix A.

(Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1))

d. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1)(a), 3745-17-07(A)(1), and 3745-77-07(C)(1))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0121264: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.



13. Emissions Unit Group - Treater: K003, K004, K005

EU ID	Operations, Property and/or Equipment Description
K003	Treater #100 - Resin paper coating line with electric curing oven
K004	Treater #101 - Resin paper coating line with electric curing oven
K005	Treater #102 - Resin paper coating line with electric curing oven

- 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 3745-21-09(PP)(1)	The VOC content of the coatings employed shall not exceed 0.9 pound of VOC per gallon of coating, as applied, excluding water and exempt solvents.
b.	40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) National Emission Standard for Hazardous Air Pollutants: Paper and other Web Coating [In accordance with 40 CFR 63.3290, this emissions unit is an existing web coating line located at an existing facility that is a major source of HAP, subject to the emissions limitations and control measures specified in this section.]	As specified in 40 CFR 63.3320(b)(2) and (b)(3), organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) or more than 20 percent of the mass of coating solids applied (0.20 kg organic HAP per kg coating solid) for each month. See b)(2)a.
c.	40 CFR Part 63, Subpart A (40 CFR 63.1 – 15 and 40 CFR 63.3340)	Table 2 to 40 CFR Part 63, Subpart JJJJ- Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. Pursuant to 63.3370, the permittee may demonstrate compliance with the organic HAP emission limitations in b)(1)b. above in accordance to the following methods for this uncontrolled emissions unit:

63.3370(a)(1)	use of “as-purchased” compliant coating materials according to the procedures specified in 63.3370(b)
63.3370(a)(2)	use of “as-applied” compliant coating materials according to the procedures specified in 63.3370(c)(1) – (c)(5)
63.3370(a)(3)	tracking total monthly organic HAP applied according to the procedures specified in 63.3370(d)

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee, having chosen to demonstrate compliance with OAC rule 3745-21-09(PP) through the use of VOC compliant coatings, shall collect and record the following information each month for the coating lines and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and
b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.



W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

(Authority for term: OAC rules 3745-21-09(B)(3)(f), 3745-21-10(B)(8), 3745-21-09(PP), and 3745-77-07(C)(1))

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

63.3410(a)(1)	Recordkeeping requirements
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(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

e) Reporting Requirements

- (1) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Southwest Ohio Air Quality Agency within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B)(3)(g), 3745-21-09(PP), and 3745-77-07(C)(1))

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

63.3400(a)	Reporting requirements - general
63.3400(b)	Initial notification requirements
63.3400(c)(1) and (2)	Semiannual compliance report requirements
63.3400(e)	Notification of Compliance Status

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

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:



Effective Date: To be entered upon final issuance

a. Emission Limitation:

The VOC content of the coatings employed shall not exceed 0.9 pound of VOC per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the coating content limitation shall be demonstrated based on the recordkeeping requirements in d)(1) of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of coatings.

(Authority for term: OAC rules 3745-21-09(PP) and 3745-77-07(C)(1))

b. Emission Limitations:

Organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) or more than 20 percent of the mass of coating solids applied (0.20 kg organic HAP per kg coating solid) for each month.

Applicable Compliance Method:

Compliance with the applicable organic HAP emission limitation shall be determined by the methods listed in b)(2)a., the record keeping requirements in d)(2), and the procedures specified in f)(2) below.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

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

63.3360(a)(1)	Performance test methods for control of organic HAP emissions by limiting organic HAP or volatile matter content of coatings
63.3360(c)	Methods for determining organic HAP content of coatings
63.3360(d)	Methods for determining volatile organic and coating solids content of coatings

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

g) Miscellaneous Requirements

(1) None.

14. Emissions Unit Group - Trim Lines: P074, P076

EU ID	Operations, Property and/or Equipment Description
P074	#6 Trim Line, equipped with cyclone
P076	#7 Trim Line, equipped with cyclone

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #P0121264, issued 8/23/2016)	PE shall not exceed 5.41 pounds per hour and 23.69 TPY. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	PM ₁₀ emissions shall not exceed 0.27 pound per hour and 1.18 TPY. See b)(2)a. and b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	Best Available Technology (BAT) exemption. See b)(2)b.
d.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)b.i.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(B)(1) Table I	PE shall not exceed 9.51 pounds per hour.
g.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See d)(1) - d)(5), e)(1), and e)(2).

(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 State Implementation Plan:

Permit to Install P0121264 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, such that the potential to emit of each pollutant is less than 10 tons per year for the purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. the PM₁₀ emissions from emissions units P074 and P076 shall be vented to a cyclone with a minimum control efficiency of at least 99% at all times when the emissions units are in operation.

- c. The hourly and annual PE and PM₁₀ emissions limits were established to reflect the potential to emit for the emissions unit, assuming 8,760 hours of operation per year. Therefore, it is not necessary to develop PE or PM₁₀ record keeping and/or reporting requirements to demonstrate compliance with these emission limitations.

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;
- e. any corrective actions taken to minimize or eliminate the visible emissions;
- f. the date and time the corrective action was completed; and
- g. the names of the personnel who performed the work.

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

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.

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-17-07(A), and 40 CFR Part 64)

- (2) The permittee shall conduct an internal inspection of the cyclone controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following:
 - a. a review of the structural integrity for all components of the cyclone;
 - b. inspection of the inside surfaces of the cyclone for deposits or blockages; and
 - c. an inspection of the bottom of the cyclone for plugging.

The permittee shall maintain records the following information for each inspection conducted:

- d. the date and time the inspection took place;
- e. the name and job title of the employee(s) conducting the inspection;
- f. a summary of any problems found during the inspection; and
- g. a listing of corrective actions taken, if any.

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.

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 40 CFR Part 64)

- (3) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions are the visible emissions observations of the cyclone stack and the cyclone inspections.

For visible emissions, the performance indicator is the presence or absence of visible emissions identified in d)(1). An excursion of this performance indicator is defined as any occasion when visible emissions are observed exiting the cyclone stack and are not deemed to be from normal operations.

The performance indicator for the cyclone is the result of the routine inspections specified in d)(2). An excursion of this performance indicator is defined as any occasion when a problem is detected with the structural integrity, material buildup, and/or operation of the cyclone.

When the visible emission observations indicate an excursion, and/or the cyclone inspection results detect an operational problem, corrective action (including, but not limited to, an evaluation of the emissions unit and cyclone) shall be assessed and implemented as appropriate.

Upon detecting an excursion, the owner or operator shall restore operation of the emissions unit (including the control devices) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range/parameter.

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

- (4) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the

monitoring of additional parameters. Approved revisions to the monitoring 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)

- (5) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

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

- (6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0121264: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly excursion reports that identify the following:
- a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and the cause of each incident;
 - b. each inspection conducted in d)(2) that detected an operational or structural integrity problem and the cause of each incident;
 - c. the corrective action(s) taken for each incident described in (a) and (b);
 - d. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;
 - e. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance, was determined to be necessary and was not taken; and
 - f. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly 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)

- (2) If the permittee is required under 40 CFR Part 64.8 and d)(5) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

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

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0121264: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitation:

PE shall not exceed 5.41 pounds per hour and 23.69 TPY.

Applicable Compliance Method:

The short-term PE limitation above represents the controlled potential to emit and was calculated using the following equation:

$7020 \text{ lbs/hr maximum processing rate} \times (0.077 \text{ lb scrap/lb of product}^*) \times (1 - 0.99 \text{ cyclone control efficiency}^*) = 5.41 \text{ pounds PE/hour}$

*Based on material balance, manufacturer control efficiencies, and emission information included with the applications for PTI 14-05975, submitted on 8/10/2007, and PTI 14-05994, submitted on 10/12/2007.

The ton per year emission limitation was developed by multiplying the short-term allowable PE limitation (5.41 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

No emissions tests are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-5 from 40 CFR Part 60, Appendix A.

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



b. Emission Limitation:

PM₁₀ emissions shall not exceed 0.27 pound per hour and 1.18 TPY.

Applicable Compliance Method:

The short-term PM₁₀ limitation above represents the controlled potential to emit and was calculated using the following equation:

7020 pounds/hr maximum processing rate x (0.077 lb scrap/lb of product*) x 5% PM₁₀ emission factor* x (1-0.99 cyclone control efficiency*) = 0.27 pound PM₁₀/hour

*Based on material balance, manufacturer control efficiencies, and emission information included with the applications for PTI 14-05975, submitted on 8/10/2007, and PTI 14-05994, submitted on 10/12/2007.

The ton per year emission limitation was developed by multiplying the short-term allowable PM₁₀ limitation (0.27 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

No emissions tests are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-4 and 201 from 40 CFR Part 60, Appendix A.

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

c. Emission Limitation:

PE shall not exceed 9.51 pounds per hour.

Applicable Compliance Method:

The hourly PE rate above is based on Table I in OAC rule 3745-17-11 using the maximum process weight rate of 7020 lbs/hour for the emissions unit. This emission limitation is greater than the controlled potential to emit as calculated above in f)(1)a. No emissions tests are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A) using Methods 1-5 from 40 CFR Part 60, Appendix A.

(Authority for term: OAC rules 3745-17-11(B) and 3745-77-07(C)(1))

d. Emission Limitation:

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



Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-17-03(B)(1)(a), 3745-17-07(A)(1), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0121264: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.