Ohio Environmental Protection Agency

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

10/12/2016

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

GORDON BARR
NEWKOR, INC.
10410 BEREA RD.
CLEVELAND, OH 44102

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318005362
Permit Number: P0120892
Permit Type: Administrative Modification
County: Cuyahoga

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: CDAQ

Response to Comments

Facility ID:	1318005362
Facility Name:	NEWKOR, INC.
Facility Description:	Paper Coating operation
Facility Address:	10410 BEREA RD. Cleveland, OH 44102 Cuyahoga County
Permit:	P0120892, Permit-To-Install and Operate - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Plain Dealer on 09/02/2016. The comment period ended on 10/02/2016.	
Hearing date (if held)	n/a
Hearing Public Notice Date (if different from draft public notice)	n/a

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

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

1. Topic: None

a. Comment: None

b. Response: None

We did not receive any comments for the draft permit that was issued on August 26th, 2016, and we have not made any further changes to the permit recommendation.

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
NEWKOR, INC.

Facility ID:	1318005362
Permit Number:	P0120892
Permit Type:	Administrative Modification
Issued:	10/12/2016
Effective:	10/12/2016
Expiration:	7/17/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
NEWKOR, INC.

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Authorization

Facility ID:	1318005362
Application Number(s):	M0004026
Permit Number:	P0120892
Permit Description:	FEPTIO administrative modification for emissions unit P004 which is a paper coating line that includes a dipping room consisting of two 1,000-gallon in-ground saturation tanks, a drying room, and two 2.2 mmBtu/hr Midland Ross natural gas-fired baking ovens. This modification will reduce the allowable amount of resin usage to 66 tons per year per the February 18, 2016 Consent Order.
Permit Type:	Administrative Modification
Permit Fee:	$100.00
Issue Date:	10/12/2016
Effective Date:	10/12/2016
Expiration Date:	7/17/2020

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

NEWKOR, INC.
10410 BEREA RD.
Cleveland, OH 44102

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0120892
Permit Description: FEPTIO administrative modification for emissions unit P004 which is a paper coating line that includes a dipping room consisting of two 1,000-gallon in-ground saturation tanks, a drying room, and two 2.2 mmBtu/hr Midland Ross natural gas-fired baking ovens. This modification will reduce the allowable amount of resin usage to 66 tons per year per the February 18, 2016 Consent Order.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P004**
Company Equipment ID:	Dipping Room, Drying Room, Oven #1, Oven #2
Superseded Permit Number:	P0108533
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee.This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee.Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. P004, Paper Coating line

Operations, Property and/or Equipment Description:

Paper coating line that includes the following:

Dipping Room - consisting of two 1,000-gallon in-ground saturation tanks that are vented by a 5,000 acfm ventilation fan

Drying Room - consisting of an 11' 5" H x 25' W x 41' L space that is vented by a 5,000 acfm, explosion proof, ventilation fan

Curing Ovens – consisting of two 2.2 MM Btu/hr Midland Ross, Natural Gas Fired Ovens

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., b)(2)a., c)(2), d)(2), e)(1), f)(1)a., and f)(2)

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) FEPTIO to avoid Title V	Volatile organic compound (VOC) emissions shall not exceed 13.73 tons per rolling, 12-month period. Individual hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month period. Combined HAP emissions shall not exceed 13.73 tons per rolling, 12-month period.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a., and c)(2) below.
b.	OAC rule 3745-21-09(F)	2.9 pounds of VOC per gallon, excluding water and exempt solvents, for the "neat," as-purchased resin See b)(2)a., b)(2)b., and c)(3) below.

(2) Additional Terms and Conditions

a. The permittee shall comply with the VOC content limitation of 2.9 pounds of VOC per gallon of coating, minus water and exempt solvents, by employing a compliant phenol-formaldehyde resin in emissions unit P004. The "neat" as-purchased resin shall consist of phenol-formaldehyde nonvolatiles, free formaldehyde, methanol, free phenol, and water, in weight percentages that ensure ongoing compliance with the VOC content limitation and the above-specified emission limitations for VOC, individual HAP, and combined HAPs. Also, only acetone shall be used by the permittee as a diluent in emissions unit P004.

b. In accordance with OAC rule 3745-21-09(F)(2), in the event that the potential VOC emissions from this emissions unit (as established by the permit allowable) equals or exceeds 25.0 tons per year before the application of capture and control devices, the permittee shall employ a control system in order to reduce VOC emissions from the entire paper coating line by at least ninety percent or maintain a maximum VOC outlet concentration of twenty ppmv on a dry basis, whichever is less stringent.

c) Operational Restrictions

(1) After the dipping process is completed, the screened racks shall be moved to the drying room and remain there for at least 48 hours to ensure that the saturated cores are dry to the touch before they are placed in the ovens for further drying and heat curing.

(2) The maximum annual amount of "neat" phenol-formaldehyde resin usage in emissions unit P004 shall not exceed 66.0 tons , based upon a rolling, 12-month summation of the "neat" resin usage figures determined in d)(2) below. In addition, the maximum allowable individual HAP, combined HAPs, and VOC emissions from emissions unit P004 shall not exceed 9.9 tons, 13.73 tons, and 13.73 tons, respectively, based upon rolling, 12-month summations of the monthly emissions calculated in d)(2) below.

(3) The permittee shall employ the following work practice standards for all cleaning materials that are used at the facility:

a. store all VOC-containing cleaning materials and used shop towels in closed containers;

b. ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials;

c. minimize spills of VOC-containing cleaning materials;

d. convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

e. minimize VOC emission from cleaning of storage, mixing, and conveying equipment.

(4) The permittee shall not use portable totes to add "neat" phenol-formaldehyde resin to the inside storage tanks that are housed in the dip room. The dip room storage tanks shall only be replenished through loading from the outside storage tanks.

d) Monitoring and/or Recordkeeping Requirements

(1) By not later than the effective date of permit P0108533 (7/17/2015), the permittee shall install, operate, and maintain an upgraded monitoring and recordkeeping system for both of the outside storage tanks that separately store the "neat" phenol-formaldehyde resin and acetone. The upgraded system shall be capable of accurately measuring and recording the liquid volume, in gallons, of material within each storage tank, at any point in time. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

(2) The permittee shall maintain <u>monthly</u> records of the following information:

a. the manufacturer's "certificate of analysis" for each shipment of the "neat" phenol-formaldehyde resin received by the permittee, which shall specify the weight percent of phenol-formaldehyde nonvolatiles, free formaldehyde, free phenol, and methanol in the "neat" resin;

b. the amount, in tons, of phenol-formaldehyde resin in each <u>shipment</u> received by the permittee as reported on the invoice by the supplier and verified from the following:

i. record the amount, in gallons, of phenol-formaldehyde resin in the outside storage tank immediately prior to the tank being filled from a shipment;

ii. record the amount, in gallons, of phenol-formaldehyde resin in the outside storage tank immediately after the tank has been filled from a shipment;

iii. record the amount, in gallons, of phenol-formaldehyde resin received from the shipment determined from d)(2)b.ii. – d)(2)b.i.; and

iv. the amount, in tons, of phenol-formaldehyde resin received from the shipment determined from d)(2)b.iii. x d)(2)c. x 0.0005 ton per pound;

c. the density of the "neat" resin, in pounds per gallon, as shown in the latest technical data sheet provided by the manufacturer;

d. the amount, in gallons, of phenol-formaldehyde resin in the outside storage tank at the beginning of each calendar month (the first day the facility is in operation during the month);

e. the amount, in tons, of phenol-formaldehyde resin in the outside storage tank at the beginning of each month (the first day the facility is in operation during the month), i.e., d)(2)c. x d)(2)d. x 0.0005 ton per pound;

f. the rolling 12-month summation, in tons, of the amounts of phenol-formaldehyde resin in all shipments received by the permittee, i.e., the summation of d)(2)b. plus the total of the amounts from the previous 11 calendar months;

g. the rolling 12-month summation, in tons, of the phenol-formaldehyde resin usage, i.e., d)(2)f. + d)(2)e. at the start of the 12-month period - d)(2)e. at the end of the 12-month period;*

h. based upon the certificates of analysis for all the shipments of phenol-formaldehyde resin received by the permittee during the past 12 calendar months, the individual, average weight % for free formaldehyde, methanol, and free phenol; and

i. the rolling 12-month summation of the individual HAP emissions, in tons, of free formaldehyde, methanol, and free phenol, i.e., d)(2)g. x the average weight % for each constituent from d)(2)h., and the rolling, 12-month summation of emissions, in tons, of VOC and combined HAPs, i.e., the summation of the rolling, 12-month summations of emissions of free formaldehyde, methanol, and free phenol.

*Note: for purposes of this permit, the storage tank inventory on the last operating day of a calendar month is equal to the storage tank inventory for the first operating day of the subsequent month.

The permittee shall include the calendar date for each item recorded above and the name of the person who recorded the data. These records shall be maintained electronically or in a written log.

(3) The permittee shall maintain annual records of the following information:

a. the amount, in gallons (with a density of 6.6 pounds per gallon), of acetone in each shipment received by the permittee during the calendar year as reported on the invoice by the supplier and verified from the following:

i. record the amount, in gallons, of acetone in the outside storage tank immediately prior to the tank being filled from a shipment;

ii. record the amount, in gallons, of acetone in the outside storage tank immediately after the tank has been filled from a shipment; and

iii. record the amount, in gallons, of acetone received from the shipment determined from d)(3)a.ii. – d)(3)a.i.;

b. the amount, in gallons, of acetone in the outside storage tank at the beginning of each calendar year, i.e., the first day the facility is in operation during the calendar year; and

c. the amount, in tons, of acetone used during the calendar year, i.e., [the summation of d)(3)a. for all shipments received by the permittee + d)(3)b. at the start of the calendar year - d)(3)b. at the end of the calendar year] x (6.6 pounds acetone/gallon) x (0.0005 ton/pound)].

The permittee shall include the calendar date for each item recorded above and the name of the person who recorded the data. These records shall be maintained electronically or in a written log.

e) Reporting Requirements

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

a. all deviations (excursions) of the following limitations and operational restrictions that restrict the potential to emit (PTE) of the regulated air pollutants and have been detected by the monitoring and recordkeeping requirements in this permit:

i. the rolling 12-month usage limitation specified in c)(2) for the “neat” phenol-formaldehyde resin usage; and

ii. the rolling 12-month emission limitations specified in c)(2) for individual HAP, combined HAPs, and VOC.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October through December), April 30 (covering January through March), July 31 (covering April through June), and October 31 (covering July through September), unless an alternative schedule has been established and approved by the Cleveland DAQ.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) 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 District Office or local air 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 signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

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

a. <u>Emissions Limitations</u>:

Volatile organic compound (VOC) emissions shall not exceed 13.73 tons per rolling, 12-month period.

Individual hazardous air pollutant (HAP) emissions shall not exceed 9.9 tons per rolling, 12-month period.

Combined HAPs emissions shall not exceed 13.73 tons per rolling, 12-month period.

<u>Applicable Compliance Method</u>:

Compliance shall be based upon the recordkeeping specified in d)(2). The actual emissions of each individual HAP (formaldehyde, phenol, and methanol) for each rolling, 12-month period shall be calculated by multiplying the recorded resin usage amount determined in d)(2)g. times the average weight percent of the HAP for all shipments of “neat” phenol-formaldehyde resin received by the permittee during that period. The actual emissions of VOC and combined HAPs shall be determined by summing the emissions of individual HAPs during that period.

b. <u>Emission Limitation</u>:

2.9 pounds of VOC per gallon, excluding water and exempt solvents, for the “neat” phenol-formaldehyde resin

Applicable Compliance Method:

In accordance with OAC rule 3745-21-04(B)(5), the VOC content of the "neat" phenol-formaldehyde resin shall be determined using USEPA Method 24 of 40 CFR Part 60, Appendix A.

The permittee obtained a Method 24 analysis of the "neat" phenol-formaldehyde resin and submitted the results to Ohio EPA with the amended renewal application that was submitted on March 17, 2015. If required by Ohio EPA and/or Cleveland DAQ, the permittee shall have additional Method 24 analyses performed for the "neat" phenol-formaldehyde resin to demonstrate compliance.

In addition, the certificate of analysis for each shipment of resin received by the permittee may be used to demonstrate ongoing compliance with the allowable VOC content limitation.

(2) The identity and content of each individual HAP may be determined using either standard gas chromatographic techniques or the analytical data from the resin manufacturer.

g) Miscellaneous Requirements

(1) This emissions unit was installed in 1972.