Ohio Environmental Protection Agency

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

10/31/2016

Certified Mail

No	TOXIC REVIEW
Yes	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

Mr. Dane Marsee
Mane, Inc.
2501 Henkle Dr.
Lebanon, OH 45036

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1483060488
Permit Number: P0121421
Permit Type: Initial Installation
County: Warren

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 Southwest Ohio Air Quality Agency at (513)946-7777 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: SWOAQA

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Mane, Inc.

Facility ID:	1483060488
Permit Number:	P0121421
Permit Type:	Initial Installation
Issued:	10/31/2016
Effective:	10/31/2016
Expiration:	3/26/2019

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Mane, Inc.

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Authorization

Facility ID:	1483060488
Application Number(s):	A0056511
Permit Number:	P0121421
Permit Description:	Initial installation permit for Flavor Capsules Production Line, Spray Dryer and Fluid Bed Dryer.
Permit Type:	Initial Installation
Permit Fee:	$600.00
Issue Date:	10/31/2016
Effective Date:	10/31/2016
Expiration Date:	3/26/2019

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

This document constitutes issuance to:

Mane, Inc.
2501 Henkle Dr
Lebanon, OH 45036

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:

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

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: P0121421
Permit Description: Initial installation permit for Flavor Capsules Production Line, Spray Dryer and Fluid Bed Dryer.

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

Emissions Unit ID:	**P020**
Company Equipment ID:	Line #11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P021**
Company Equipment ID:	Techni Spray Dryer 2.5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P022**
Company Equipment ID:	Vector Fluid Bed Dryer
Superseded Permit Number:	
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) 2., thru 4. and 6.

2. The actual emissions of Volatile Organic Compounds (VOC) from emissions units P001 (Techni Spray Dryer), P002 (Production Minor Spray Dryer), P004 (Flavor capsules production - Line #1 film mix tank and feed tank, extruder, centrifuge, oil recovery, two pan dryers, finishing and packaging, equipment cleaning system), P005 (Flavor capsules production - Line #2 film mix tank and feed tank, extruder, centrifuge, oil recovery, two pan dryers, finishing and packaging, equipment cleaning system, P006 (Flavor capsules production - Line #3 film mix tank and feed tank, extruder, centrifuge, one pan coater, one fluid bed dryer, product finishing and packaging operations, equipment cleaning systems), P007 (Flavor capsules production - film mix tank and feed tank, extruder, centrifuge, pan coater, fluid bed-dryer, product finishing and packaging operations and equipment cleaning systems), P008 (Line #6 flavor capsules production - film mix tank and feed tank, extruder, centrifuge, oil recovery, two pan dryers, finishing and packaging, equipment cleaning system), P009 (Line #7 flavor capsules production - film mix tank and feed tank, extruder, centrifuge, oil recovery, two pan dryers, finishing and packaging, equipment cleaning system), P010 (Line #8 flavor capsules production - film mix tank and feed tank, extruder, centrifuge, oil recovery, two pan dryers, finishing and packaging, equipment cleaning system), P011 (Line #5 flavor capsules production - film mix tank and feed tank, extruder, centrifuge, oil recovery, two pan dryers, finishing and packaging, equipment cleaning system, related utilities), P012 (Flavor capsules production - Line #9 film mix tank and feed tank, extruder, centrifuge, oil recovery, two pan dryers, finishing and packaging, equipment cleaning system), P013 (Flavor capsules production - Line #10 film mix tank and feed tank, extruder, centrifuge, oil recovery, two pan dryers, finishing and packaging, equipment cleaning system), P015-P018 (Emergency generators), P019 (Techni Spray Dryer – 350), P020 (Flavor capsules production - Line #11 film mix tank and feed tank, extruder, centrifuge, oil recovery, two pan dryers, finishing and packaging, equipment cleaning system), P021 (Techni Spray Dryer 2.5 - flavor mix and feed tanks, spray dryer, product recovery cyclones, and dry product sifter), P022 (Vector Fluid Bed Dryer - (Model# VFC-120MX)),all de minimis emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 99 TPY.

3. The permittee shall collect and record the following information each month for all processes which emit VOCfrom any emissions unit listed in 2. that applies VOC-containing materials in the facility:

   a) The name and identification number/code of each batch of product which results in emissions of VOC;

   b) The Identification of the EU in which the batch was produced;

c) The calculated VOC emissions per batch;

d) The total combined VOC emissions from all production from all of the EU's identified in 2. during the month, in ton(s), i.e., the summation of all the individual VOC emissions from "c" above;

e) The total emissions during the rolling, 12-month period, i.e., the summation of the VOC emissions, as recorded in "d" above, for the present month plus the previous 11 months of operation, in ton(s).

4. The permittee shall submit quarterly deviation (excursion) reports for any emissions unit that applies VOC-containing materials listed in 2. that identify:

a) All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

(1) All exceedances of the rolling, 12-month total combined VOC emissions limitation;

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 to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

5. 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.

6. Compliance with the above limitations in 2. shall be based on a rolling 12-month summation and the recordkeeping requirements listed in this permit.

C. Emissions Unit Terms and Conditions

1. P020, Line #11

Operations, Property and/or Equipment Description:

Flavor capsules production - Line #11

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. b)(1)b.

(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)c.

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) June 30, 2008	The permittee shall install a wet scrubber with a design efficiency of at least 90% control of volatile organic compounds (VOC). The permittee shall install a wet scrubber with a design efficiency of at least 90% control of particulate emissions, particulate matter emissions having a diameter of 10 microns and less, and particulate matter emissions having a diameter of 2.5 microns and less (PE/PM10/PM2.5). See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A) do not apply to the VOC, PE, PM10, and PM2.5 emissions from this air

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		contaminant source since the potential to emit is less than 10 tons per year. See b)(2)b.
c.	OAC rule 3745-31-05(D), June 30, 2008	See 2., thru 4. and 6. of Section B.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 0.551 pound per hour based on Table I. See b)(2)b.

(2) Additional Terms and Conditions

a. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) 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.

(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 PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated through visible emission observations performed in accordance with USEPA Method 9.

b. Emission Limitation:

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

If required to demonstrate compliance based on process data, the permittee shall calculate the PE/PM10 emissions rate by using the following calculations established from information, including proprietary production information, supplied by the permittee in PTIO application A0056511 on August 10, 2016, for PTIO P0121421:

0.80 pound PE/PM10/batch solids from Film Charge, uncontrolled x (1 – 0.95 CE) x 6 batches/day = 0.24 pound PE/PM10/day, rounded to 0.24 pound PE/PM10/day

0.16 pound PE/PM10/batch solids from Silica Charge, uncontrolled x (1 – 0.90 CE) x (1 – 0.75 CE) x 6 batches/day = 0.024 pound PE/PM10/day, rounded to 0.02 pound PE/PM10/day

0.24 + 0.02 = 0.26 pound PE/PM10/day, x day/24 hours = 0.011 lb. pound PE/PM10/hr.

The SIP PE limitation was established from Table I of OAC rule 3745-17-11 using proprietary production information, supplied by the permittee in PTIO application A0056511 on August 10, 2016, for PTIO P0121421:

PWR (P) between 0 TPH and 0.05 TPH is considered Trade Secret

E = 0.551 pounds of PE per hour

PE can be shown to be less than 10 TPY taking into account the Federally Enforceable rule limit:

0.551 pound PE/hour x 8760 hours/year x 1 Ton/2000 pounds = 2.41 TPY PE.

c. Applicable Emissions Limitations/Control Measures

The permittee shall install a wet scrubber with a design efficiency of at least 90% control of volatile organic compounds (VOC).

The permittee shall install a wet scrubber with a design efficiency of at least 90% control of particulate emissions, particulate matter emissions having a diameter of 10 microns and less, and particulate matter emissions having a diameter of 2.5 microns and less (PE/PM10/PM2.5).

Based on the information submitted by the permittee in PTIO application A0056511 on August 10, 2016, for PTIO P0121421.

If required, the design control efficiencies shall be demonstrated by emission tests using Methods 1-5 and 25 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

2. P021, Techni Spray Dryer 2.5

Operations, Property and/or Equipment Description:

Techni Spray Dryer 2.5

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. b)(1)b.

(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)c.

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) June 30, 2008	Emissions of volatile organic compounds (VOC) shall not exceed 0.14 ton per month, averaged over a 12-month rolling period. The permittee shall install a wet scrubber with a design efficiency of at least 90% control of particulate emissions, particulate matter emissions having a diameter of 10 microns and less, particulate matter emissions having a diameter of 2.5 microns and less (PE/PM10/PM2.5). See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(2)b.
c.	OAC rule 3745-31-05(D) June 30, 2008	See 2., thru 4. and 6. of Section B.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)	Particulate emissions (PE) from this emissions unit shall not exceed 0.551 pound per hour based on Table 1. See b)(2)b.

(2) Additional Terms and Conditions

a. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) 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.

(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 PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emissions Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 0.14 ton per month, averaged over a 12-month rolling period.

Applicable Compliance Method:

The monthly VOC emissions rates were calculated from information submitted by the permittee in PTIO application A0056511 on August 10, 2016, for PTIO P0121421:

Maximum potential 0.37 lb/hr VOC in the exhaust x 8760 hrs/year x 1 ton/2000 lb per ton. Divide the annual rate by 12 months.

b. Emissions Limitation:

The permittee shall install a wet scrubber with a design efficiency of at least 90% control of PE/PM10/PM2.5.

Applicable Compliance Method:

Based on the information submitted by the permittee in PTIO application A0056511 on August 10, 2016, for PTIO P0121421.

If required, the design control efficiencies shall be demonstrated by emission tests using Methods 1-5 and 25 of 40 CFR Part 60, Appendix A.

c. Emissions Limitation:

Particulate emissions (PE) shall not exceed 0.551 pound per hour based on Table I in OAC rule 3745-17-11(B).

Applicable Compliance Method:

If required, compliance with the PE mass emission limitation may be demonstrated by emissions tests using methodology including, but not limited to, Methods 1 - 5, as specified in 40 CFR Part 60, Appendix A.

d. Emissions 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.

g) Miscellaneous Requirements

(1) None.

3. P022, Vector Fluid Bed Dryer

Operations, Property and/or Equipment Description:

Vector Fluid Bed Dryer

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. b)(1)b.

(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)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and ORC 3704.03(T)	Emissions of volatile organic compounds (VOC) shall not exceed 1.46 tons per month, averaged over a 12-month rolling period.
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	The permittee shall install a baghouse filter with a design efficiency of at least 99% control of particulate emissions particulate matter emissions having a diameter of 10 microns and less, and particulate matter emissions having a diameter of 10 microns and less (PE/PM10/PM10). See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE/PM10, emissions from this air contaminant source since the potential to emit for each

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		is less than 10 tons per year. See b)(2)b.
d.	OAC rule 3745-31-05(D) June 30, 2008	See 2., thru 4. and 6. of Section B.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(B)	Particulate emissions (PE) from this emissions unit shall not exceed 1.36 pounds per hour based on Table 1. See b)(2)b.

(2) Additional Terms and Conditions

a. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) 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.

(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 PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emissions Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 1.46 tons per month, averaged over a 12-month rolling period.

Applicable Compliance Method:

The monthly VOC emissions rates were calculated from information submitted by the permittee in PTIO application A0056511 on August 10, 2016, for PTIO P0121421:

Maximum potential 4.0 lb/hr VOC in the exhaust x 8760 hrs/year x 1 ton/2000 lb per ton. Divide the annual rate by 12 months.

b. Emissions Limitation:

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE/PM10/PM2.5 from this contaminant source since the potential to emit for PE/PM10/PM2.5 is less than 10 tons/year.

Applicable Compliance Method:

In order to demonstrate potential to emit less than 10 tons/year, the annual PE/PM10/PM2.5 emissions rate were calculated from information submitted by the permittee in PTIO application A0056511 on August 10, 2016, for PTIO P0121421:

0.11 lb PE/PM10/PM2.5/hr x 8760 hrs/yr x 1 Ton/2000 lbs. = 0.48 TPY PE/PM10/PM2.5.

If required to demonstrate compliance based on actual emissions, considering the use of the fabric filter baghouse, the permittee shall calculate the PE/PM10/PM2.5 emission rates by multiplying the actual annual throughput (lbs/yr) by the solids content, decimal (lb solids/lb) multiplied by the efficiency of the product recovery device [1 – (PR, %/100)] multiplied by the control efficiency

of the fabric filter baghouse [1 – (CE, %/100)] and divided by 2000 lbs = TPY PE/PM10/PM2.5, actual emissions.

c. Emissions Limitation:

The use of a fabric filter baghouse with a minimum control efficiency of 99% for PE/PM10/PM2.5.

Applicable Compliance Method:

Based on the information submitted by the permittee in PTIO application A0056511 on August 10, 2016, for PTIO P0121421.

d. Emissions Limitation:

Particulate emissions (PE) shall not exceed 1.36 pounds per hour based on Table I in OAC rule 3745-17-11(B).

Applicable Compliance Method:

If required, compliance with the PE mass emission limitation may be demonstrated by emissions tests using methodology including, but not limited to, Methods 1 - 5, as specified in 40 CFR Part 60, Appendix A.

e. Emissions 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.

g) Miscellaneous Requirements

(1) None.