

Facility ID: 1431380503 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit P044](#)
- [Go to Part II for Emissions Unit P045](#)
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Facility ID: 1431380503 Emissions Unit ID: P044 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P044 - granulation drying oven TG-81 with fabric filter and wet scrubber - modification	OAC rule 3745-31-05(A)(3) (PTI 14-05459)	Particulate Emissions (PE) and Particulate Matter 10 microns and less in diameter (PM10) shall not exceed 0.01 lb/hr* and 0.04 TPY* PM/PM10. Volatile Organic Compound (VOC) emissions shall not exceed 9.5 lbs/hr* and 33 lbs/day** when employing nonphotochemically reactive materials. *The hourly and annual emission limitations for PM/PM10 and the hourly non-photochemically reactive VOC limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits. ** this emissions unit is a batch operation and the daily emissions are based on the worst case batch employed in this emission unit. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-31-05(C). Volatile Organic Compound (VOC) emissions shall not exceed 8 lbs/hour and 40 lbs/day when employing photochemically reactive materials.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six minute average, except as specified by rule.
	OAC 3745-17-11(B)	The emission limitation(s)/opacity restrictions established by this rule is less stringent than those established by Ohio Administrative Code rule 3745-31-05 (A)(3).
	OAC rule 3745-31-05(C)	Volatile Organic Compound (VOC) emissions shall not exceed 6.0 TPY, based on a rolling, 12-month summation.

2. **Additional Terms and Conditions**
 - (a) Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by emissions limitations, the use of a HEPA filter with a control efficiency of at least 99.9 percent for particulate emissions, and the use of a wet scrubber with a control efficiency of at least 90 percent when non-photochemically reactive

material is employed.

The permittee shall control non-photochemically reactive material VOC emissions from this emissions unit by use of a wet scrubber capable of maintaining a minimum overall VOC control efficiency of 90% by weight. The requirement to use a wet scrubber does not apply when the permittee does not use any organic compounds as wetting agents or when employing photochemically reactive material as long as the permittee meets the mass emissions limitations listed in A.1 above.

The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units B001, B003, P002-P008, P010, P012, P014, P015, P044-P048, P051, other de minimus air contaminant source, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The maximum volatile organic compound solvent content per batch shall not exceed 220 pounds/batch.

B. Operational Restrictions

1. The scrubber water supply pressure shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.
2. The scrubber water flow rate shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.
3. The operation of the control equipment outside of the restrictions established in the Special Terms and Conditions may or may not indicate a mass emission violation. If required by the Ohio EPA, compliance with the mass emission limitations shall be determined by performing concurrent mass emission tests and parameter readings, using US EPA-approved methods and procedures. The results of any required emission tests and parameter readings shall be used in determining whether or not the operation of the control equipment outside of the restrictions specified in the Special Terms and Conditions is indicative of a possible violation of the mass emission limitations.
4. The maximum annual volatile organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the scrubber water supply pressure and scrubber water flow rate while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with deviations as deemed necessary by the permittee.

The permittee shall collect and record the following information each day that the emissions unit is operating:

- a. The scrubber water flow rate, in gallons per minute.
 - b. The scrubber water supply pressure, in psig.
 - c. A log of the operating time for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - d. The position of the by-pass valve, indicating whether the exhaust stream from the ovens is going to the wet scrubbers.
2. On any day that any photochemically reactive material [as identified in OAC rule 3745-21-01(C)(5)] is employed, the permittee shall collect and record the following information:
 - a. The company identification of each volatile organic solvent material employed.
 - b. The total amount of volatile organic solvent material employed, in pounds.
 - c. The total volatile organic compound emissions from all volatile organic solvents employed, in pounds
 - d. The total number of hours of operation.
 - e. The average hourly volatile organic compound emission rate for all volatile organic solvents employed, (c/d), in pounds per hour (average).
 3. The permittee shall maintain monthly records of following information:
 - a. The volatile organic solvent usage rate for each month, in pounds.
 - b. The rolling, 12-month summation of the volatile organic solvent usage rate, in pounds.
 4. The permittee shall collect and record the following information each month:
 - a. The number of batches made during the month.
 - b. The VOC solvent content of each batch, in pounds per batch.
 - c. An identification of whether the VOC content of the material employed is photochemically reactive material,
 - d. The total amount of non-PRM solvent sprayed during the month, in pounds.
 - e. The total amount of PRM solvent sprayed during the month, in pounds.
 - f. The monthly VOC emissions calculated as follows for non-PRM materials:
 Monthly VOC emissions (lbs/month)
 = total solvent sprayed during the month (pounds) * (1- the control efficiency determined during the most recent

performance test)

g. The monthly VOC emissions calculated as follows for PRM materials:

Monthly VOC emissions (lbs/month)
= total solvent sprayed during the month (pounds)

h. The total monthly VOC emissions calculated for non-PRM materials and PRM materials (f+g), in lbs/month.

i. The rolling, 12-month VOC emission rate in tons per year

These records shall be summarized at the end of each calendar year to determine the annual VOC emissions.

5. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.c:

a. The name and identification of each HAP employed.

b. The amount of each HAP employed, in pounds.

c. The total individual HAP emissions from each individual HAP employed, in pounds or tons per month.

d. The total combined HAP emissions from all HAPs employed, in pounds or tons per month.

e. The updated rolling, 12-month summation of emissions for each individual HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

f. The updated rolling, 12-month summation of emissions for the total combined HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on an emission unit - by- emission unit basis.

6. The permittee shall maintain daily records of any day when nonphotochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.

D. Reporting Requirements

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

a. All periods of time during which the following scrubber parameters were not maintained at or above the required levels:

i. The scrubber water flow rate.

ii. The scrubber water supply pressure.

b. All exceedances of the updated rolling, 12- month summation of the organic solvent usage rate and the updated rolling, 12-month VOC emissions limitations.

c. All exceedances of the HAP usage limitations set forth in term A.2.c.

d. Each day during which a photochemically reactive material was employed where the VOC emission rate exceeded 8 pounds per hour and/or 40 pounds per day.

e. Any day non-photochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.

2. These quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the organic solvent content limit per batch set forth in term A.2.d. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period then a report is required stating so.

4. The permittee shall submit annual PM/PM10 and VOC emissions reports.

5. These annual reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emissions Limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

2. Emissions Limitations:
Particulate Emissions (PE) and Particulate Matter 10 microns and less in diameter (PM10) shall not exceed 0.01 lb/hr and 0.04 TPY.

Applicable Compliance Method:

Compliance shall be determined utilizing the total dry material throughput (in lbs/hr) multiplied by the minimum HEPA control efficiency of 99.97%. The hourly number is then multiplied by 8760 hours per year and divided by 2000 lbs/ton.

3. Emissions Limitations:
Volatile Organic Compound (VOC) emissions shall not exceed 8 lbs/hour and 40 lbs/day when employing photochemically reactive materials.
- Applicable Compliance Method:
Compliance shall be demonstrated by the recordkeeping in section C.2.
4. Emission limitation :
Volatile Organic Compound (VOC) emissions shall not exceed 9.5 lbs/hr when employing nonphotochemically reactive materials.
- Applicable Compliance Method:
Approximately 12 months after permit issuance of this permit to operate, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate and overall control efficiency for VOC.
 - The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Method 25 of 40 CFR Part 60, Appendix A- if applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.
 - The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.
- 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.)
- 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 OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/15/95." 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."
- Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).
- Personnel from the Hamilton County Department of Environmental Services 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.
- A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.
5. Emissions Limitation:
Volatile Organic Compound (VOC) emissions shall not exceed 6.0 TPY, based on a rolling, 12-month summation.
- Applicable Compliance Method:
Compliance shall be determined by the record keeping in section C.2.
6. Emissions Limitation:
The maximum annual volatile organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.
- Applicable Compliance Method:
Compliance shall be determined by the record keeping in section C.3.
7. Compliance with the 12-month rolling HAP limitations outlined in term A.2.c shall be demonstrated by the record keeping in section C.5.
8. Emissions Limitation:
The maximum volatile organic compound solvent content per batch shall not exceed 220 pounds/batch.
- Applicable Compliance Method:
Compliance shall be determined by the record keeping in section C.4.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D and E.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431380503 Emissions Unit ID: P045 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P045 - granulation drying oven TG-82 with fabric filter and wet scrubber - modification	OAC rule 3745-31-05(A)(3) (PTI 14-05459)	<p>Particulate Emissions (PE) and Particulate Matter 10 microns and less in diameter (PM10) shall not exceed 0.01 lb/hr* and 0.04 TPY* PM/PM10.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 9.5 lbs/hr* and 33 lbs/day** when employing nonphotochemically reactive materials.</p> <p>*The hourly and annual emission limitations for PM/PM10 and the hourly non-photochemically reactive VOC limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits.</p> <p>** this emissions unit is a batch operation and the daily emissions are based on the worst case batch employed in this emission unit.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-31-05(C).</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 8 lbs/hour and 40 lbs/day when employing photochemically reactive materials.</p> <p>Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six minute average, except as specified by rule.</p> <p>The emission limitation(s)/opacity restrictions established by this rule is less stringent than those established by Ohio Administrative Code rule 3745-31-05 (A)(3).</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 6.0 TPY, based on a rolling, 12-month summation.</p>
	OAC rule 3745-17-07(A)(1)	
	OAC 3745-17-11(B)	
	OAC rule 3745-31-05(C)	

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by emissions limitations, the use of a HEPA filter with a control efficiency of at least 99.9 percent for particulate emissions, and the use of a wet scrubber with a control efficiency of at least 90 percent when non-photochemically reactive material is employed.

The permittee shall control non-photochemically reactive material OC emissions from this emissions unit by use of a wet scrubber capable of maintaining an minimum overall OC control efficiency of 90% by weight. The requirement to use a wet scrubber does not apply when the permittee does not use any organic compounds as wetting agents or when employing photochemically reactive material as long as the permittee meets the mass emissions limitations listed in A.1 above.

The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units B001, B003, P002-P008, P010, P012, P014, P015, P044-P048, P051, other de minimus air contaminant source, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for

any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The maximum organic compound solvent content per batch shall not exceed 220 pounds/batch.

B. Operational Restrictions

1. The scrubber water supply pressure shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.
2. The scrubber water flow rate shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.
3. The operation of the control equipment outside of the restrictions established in the Special Terms and Conditions may or may not indicate a mass emission violation. If required by the Ohio EPA, compliance with the mass emission limitations shall be determined by performing concurrent mass emission tests and parameter readings, using US EPA-approved methods and procedures. The results of any required emission tests and parameter readings shall be used in determining whether or not the operation of the control equipment outside of the restrictions specified in the Special Terms and Conditions is indicative of a possible violation of the mass emission limitations.
4. The maximum annual organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the scrubber water supply pressure and scrubber water flow rate while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with deviations as deemed necessary by the permittee.

The permittee shall collect and record the following information each day that the emissions unit is operating:

- a. The scrubber water flow rate, in gallons per minute.
 - b. The scrubber water supply pressure, in psig.
 - c. A log of the operating time for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - d. The position of the by-pass valve, indicating whether the exhaust stream from the ovens is going to the wet scrubbers.
2. On any day that any photochemically reactive material [as identified in OAC rule 3745-21-01(C)(5)] is employed, the permittee shall collect and record the following information:
 - a. The company identification of each volatile organic solvent material employed.
 - b. The total amount of volatile organic solvent material employed, in pounds.
 - c. The total volatile organic compound emissions from all volatile organic solvents employed, in pounds
 - d. The total number of hours of operation.
 - e. The average hourly volatile organic compound emission rate for all volatile organic solvents employed, (c/d), in pounds per hour (average).
 3. The permittee shall maintain monthly records of following information:
 - a. The volatile organic solvent usage rate for each month, in pounds.
 - b. The rolling, 12-month summation of the volatile organic solvent usage rate, in pounds.
 4. The permittee shall collect and record the following information each month:
 - a. The number of batches made during the month.
 - b. The VOC solvent content of each batch, in pounds per batch.
 - c. An identification of whether the VOC content of the material employed is photochemically reactive material,
 - d. The total amount of non-PRM solvent sprayed during the month, in pounds.
 - e. The total amount of PRM solvent sprayed during the month, in pounds.
 - f. The monthly VOC emissions calculated as follows for non-PRM materials:
 Monthly VOC emissions (lbs/month)
 = total solvent sprayed during the month (pounds) * (1- the control efficiency determined during the most recent performance test)
 - g. The monthly VOC emissions calculated as follows for PRM materials:
 Monthly VOC emissions (lbs/month)
 = total solvent sprayed during the month (pounds)
 - h. The total monthly VOC emissions calculated for non-PRM materials and PRM materials (f+g), in lbs/month.
 - i. The rolling, 12-month VOC emission rate in tons per year

These records shall be summarized at the end of each calendar year to determine the annual VOC emissions.

5. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.c:
 - a. The name and identification of each HAP employed.
 - b. The amount of each HAP employed, in pounds.
 - c. The total individual HAP emissions from each individual HAP employed, in pounds or tons per month.
 - d. The total combined HAP emissions from all HAPs employed, in pounds or tons per month.
 - e. The updated rolling, 12-month summation of emissions for each individual HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - f. The updated rolling, 12-month summation of emissions for the total combined HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on an emission unit - by- emission unit basis.
6. The permittee shall maintain daily records of any day when nonphotochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - i. The scrubber water flow rate.
 - ii. The scrubber water supply pressure.
 - b. All exceedances of the updated rolling, 12- month summation of the organic solvent usage rate and the updated rolling, 12-month VOC emissions limitations.
 - c. All exceedances of the HAP usage limitations set forth in term A.2.c.
 - d. Each day during which a photochemically reactive material was employed where the VOC emission rate exceeded 8 pounds per hour and/or 40 pounds per day.
 - e. Any day non-photochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.
2. These quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the organic solvent content limit per batch set forth in term A.2.d. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period then a report is required stating so.
4. The permittee shall submit annual PM/PM10 and VOC emissions reports.
5. These annual reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emissions Limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.
2. Emissions Limitations:
Particulate Emissions (PE) and Particulate Matter 10 microns and less in diameter(PM10) shall not exceed 0.01 lb/hr and 0.04 TPY.

Applicable Compliance Method:
Compliance shall be determined utilizing the total dry material throughput (in lbs/hr) multiplied by the minimum HEPA control efficiency of 99.97%. The hourly number is then multiplied by 8760 hours per year and divided by 2000 lbs/ton.
3. Emissions Limitations:
Volatile Organic Compound (VOC) emissions shall not exceed 8 lbs/hour and 40 lbs/day when employing photochemically reactive materials.

Applicable Compliance Method:
Compliance shall be demonstrated by the recordkeeping in section C.2.
4. Emission limitation :
Volatile Organic Compound (VOC) emissions shall not exceed 9.5 lbs/hr when employing nonphotochemically reactive materials.

Applicable Compliance Method:

Approximately 12 months after permit issuance of this permit to operate, 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 to demonstrate compliance with the allowable mass emissions rate and overall control efficiency for VOC.
- b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Method 25 of 40 CFR Part 60, Appendix A- if applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.
- c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

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.)

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 OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/15/95." 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."

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.

5. **Emissions Limitation:**
Volatile Organic Compound (VOC) emissions shall not exceed 6.0 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be determined by the record keeping in section C.2.
6. **Emissions Limitation:**
The maximum annual volatile organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

Applicable Compliance Method:
Compliance shall be determined by the record keeping in section C.3.
7. Compliance with the 12-month rolling HAP limitations outlined in term A.2.c shall be demonstrated by the record keeping in section C.5.
8. **Emissions Limitation:**
The maximum volatile organic compound solvent content per batch shall not exceed 220 pounds/batch.

Applicable Compliance Method:
Compliance shall be determined by the record keeping in section C.4.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D and E.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431380503 Emissions Unit ID: P046 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P046 - granulation drying oven TG-83 with fabric filter and wet scrubber - modification	OAC rule 3745-31-05(A)(3) (PTI 14-05459)	Particulate Emissions (PE) and Particulate Matter 10 microns and less in diameter (PM10) shall not exceed 0.01 lb/hr* and 0.04 TPY* PM/PM10. Volatile Organic Compound (VOC) emissions shall not exceed 9.5 lbs/hr* and 33 lbs/day** when employing nonphotochemically reactive materials. *The hourly and annual emission limitations for PM/PM10 and the hourly non-photochemically reactive VOC limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits. ** this emissions unit is a batch operation and the daily emissions are based on the worst case batch employed in this emission unit. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-31-05(C).
	OAC rule 3745-17-07(A)(1)	Volatile Organic Compound (VOC) emissions shall not exceed 8 lbs/hour and 40 lbs/day when employing photochemically reactive materials.
	OAC 3745-17-11(B)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-31-05(C)	The emission limitation(s)/opacity restrictions established by this rule is less stringent than those established by Ohio Administrative Code rule 3745-31-05 (A)(3). Volatile Organic Compound (VOC) emissions shall not exceed 6.0 TPY, based on a rolling, 12-month summation.

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by emissions limitations, the use of a HEPA filter with a control efficiency of at least 99.9 percent for particulate emissions, and the use of a wet scrubber with a control efficiency of at least 90 percent when non-photochemically reactive material is employed.
The permittee shall control non-photochemically reactive material VOC emissions from this emissions unit by use of a wet scrubber capable of maintaining an minimum overall VOC control efficiency of 90% by weight. The requirement to use a wet scrubber does not apply when the permittee does not use any organic compounds as wetting agents or when employing photochemically reactive material as long as the permittee meets the mass emissions limitations listed in A.1 above.
The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units B001, B003, P002-P008, P010, P012, P014, P015, P044-P048, P051, other de minimus air contaminant source, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
The maximum organic compound solvent content per batch shall not exceed 220 pounds/batch.

B. Operational Restrictions

- 1. The scrubber water supply pressure shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.
- 2. The scrubber water flow rate shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.
- 3. The operation of the control equipment outside of the restrictions established in the Special Terms and Conditions

may or may not indicate a mass emission violation. If required by the Ohio EPA, compliance with the mass emission limitations shall be determined by performing concurrent mass emission tests and parameter readings, using US EPA-approved methods and procedures. The results of any required emission tests and parameter readings shall be used in determining whether or not the operation of the control equipment outside of the restrictions specified in the Special Terms and Conditions is indicative of a possible violation of the mass emission limitations.

4. The maximum annual organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the scrubber water supply pressure and scrubber water flow rate while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with deviations as deemed necessary by the permittee.

The permittee shall collect and record the following information each day that the emissions unit is operating:

- a. The scrubber water flow rate, in gallons per minute.
 - b. The scrubber water supply pressure, in psig.
 - c. A log of the operating time for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - d. The position of the by-pass valve, indicating whether the exhaust stream from the ovens is going to the wet scrubbers.
2. On any day that any photochemically reactive material [as identified in OAC rule 3745-21-01(C)(5)] is employed, the permittee shall collect and record the following information:
 - a. The company identification of each volatile organic solvent material employed.
 - b. The total amount of volatile organic solvent material employed, in pounds.
 - c. The total volatile organic compound emissions from all volatile organic solvents employed, in pounds
 - d. The total number of hours of operation.
 - e. The average hourly volatile organic compound emission rate for all volatile organic solvents employed, (c/d), in pounds per hour (average).

3. The permittee shall maintain monthly records of following information:

- a. The volatile organic solvent usage rate for each month, in pounds.
- b. The rolling, 12-month summation of the volatile organic solvent usage rate, in pounds.

4. The permittee shall collect and record the following information each month:

- a. The number of batches made during the month.
- b. The VOC solvent content of each batch, in pounds per batch.
- c. An identification of whether the VOC content of the material employed is photochemically reactive material,
- d. The total amount of non-PRM solvent sprayed during the month, in pounds.
- e. The total amount of PRM solvent sprayed during the month, in pounds.
- f. The monthly VOC emissions calculated as follows for non-PRM materials:
Monthly VOC emissions (lbs/month)
= total solvent sprayed during the month (pounds) * (1- the control efficiency determined during the most recent performance test)
- g. The monthly VOC emissions calculated as follows for PRM materials:
Monthly VOC emissions (lbs/month)
= total solvent sprayed during the month (pounds)
- h. The total monthly VOC emissions calculated for non-PRM materials and PRM materials (f+g), in lbs/month.
- i. The rolling, 12-month VOC emission rate in tons per year

These records shall be summarized at the end of each calendar year to determine the annual VOC emissions.

5. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.c:

- a. The name and identification of each HAP employed.
- b. The amount of each HAP employed, in pounds.
- c. The total individual HAP emissions from each individual HAP employed, in pounds or tons per month.
- d. The total combined HAP emissions from all HAPs employed, in pounds or tons per month.

e. The updated rolling, 12-month summation of emissions for each individual HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

f. The updated rolling, 12-month summation of emissions for the total combined HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on an emission unit - by- emission unit basis.

6. The permittee shall maintain daily records of any day when nonphotochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. All periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - i. The scrubber water flow rate.
 - ii. The scrubber water supply pressure.
 - b. All exceedances of the updated rolling, 12- month summation of the organic solvent usage rate and the updated rolling, 12-month VOC emissions limitations.
 - c. All exceedances of the HAP usage limitations set forth in term A.2.c.
 - d. Each day during which a photochemically reactive material was employed where the VOC emission rate exceeded 8 pounds per hour and/or 40 pounds per day.
 - e. Any day non-photochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.
 2. These quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
 3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the organic solvent content limit per batch set forth in term A.2.d. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period then a report is required stating so.
 4. The permittee shall submit annual PM/PM10 and VOC emissions reports.
 5. These annual reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emissions Limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
- Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.
2. Emissions Limitations:
Particulate Emissions (PE) and Particulate Matter 10 microns and less in diameter (PM10) shall not exceed 0.01 lb/hr and 0.04 TPY.
- Applicable Compliance Method:
Compliance shall be determined utilizing the total dry material throughput (in lbs/hr) multiplied by the minimum HEPA control efficiency of 99.97%. The hourly number is then multiplied by 8760 hours per year and divided by 2000 lbs/ton.
3. Emissions Limitations:
Volatile Organic Compound (VOC) emissions shall not exceed 8 lbs/hour and 40 lbs/day when employing photochemically reactive materials.
- Applicable Compliance Method:
Compliance shall be demonstrated by the recordkeeping in section C.2.
4. Emission limitation :
Volatile Organic Compound (VOC) emissions shall not exceed 9.5 lbs/hr when employing nonphotochemically reactive materials.
- Applicable Compliance Method:
Approximately 12 months after permit issuance of this permit to operate, 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 to demonstrate compliance with the allowable mass emissions rate and overall control efficiency for VOC.
 - b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Method 25 of 40 CFR Part 60, Appendix A- if applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

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.)

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 OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/15/95." 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."

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.

5. Emissions Limitation:
Volatile Organic Compound (VOC) emissions shall not exceed 6.0 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be determined by the record keeping in section C.2.
6. Emissions Limitation:
The maximum annual volatile organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

Applicable Compliance Method:
Compliance shall be determined by the record keeping in section C.3.
7. Compliance with the 12-month rolling HAP limitations outlined in term A.2.c shall be demonstrated by the record keeping in section C.5.
8. Emissions Limitation:
The maximum volatile organic compound solvent content per batch shall not exceed 220 pounds/batch.

Applicable Compliance Method:
Compliance shall be determined by the record keeping in section C.4.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D and E.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431380503 Emissions Unit ID: P047 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P047 - granulation drying oven TG-84 with fabric filter and wet scrubber - modification	OAC rule 3745-31-05(A)(3) (PTI 14-05459)	Particulate Emissions (PE) and Particulate Matter 10 microns and less in diameter (PM10) shall not exceed 0.01 lb/hr* and 0.04 TPY* . Volatile Organic Compound (VOC) emissions shall not exceed 9.5 lbs/hr* and 33 lbs/day** when employing nonphotochemically reactive materials. *The hourly and annual emission limitations for PM/PM10 and the hourly non-photochemically reactive VOC limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits. ** this emissions unit is a batch operation and the daily emissions are based on the worst case batch employed in this emission unit. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-31-05(C). Volatile Organic Compound (VOC) emissions shall not exceed 8 lbs/hour and 40 lbs/day when employing photochemically reactive materials.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six minute average, except as specified by rule.
	OAC 3745-17-11(B)	The emission limitation(s)/opacity restrictions established by this rule is less stringent than those established by Ohio Administrative Code rule 3745-31-05 (A)(3).
	OAC rule 3745-31-05(C)	Volatile Organic Compound (VOC) emissions shall not exceed 6.0 TPY, based on a rolling, 12-month summation.

2. Additional Terms and Conditions

- (a) Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by emissions limitations, the use of a HEPA filter with a control efficiency of at least 99.9 percent for particulate emissions, and the use of a wet scrubber with a control efficiency of at least 90 percent when non-photochemically reactive material is employed.
The permittee shall control non-photochemically reactive material VOC emissions from this emissions unit by use of a wet scrubber capable of maintaining an minimum overall VOC control efficiency of 90% by weight. The requirement to use a wet scrubber does not apply when the permittee does not use any organic compounds as wetting agents or when employing photochemically reactive material as long as the permittee meets the mass emissions limitations listed in A.1 above.
The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units B001, B003, P002-P008, P010, P012, P014, P015, P044-P048, P051, other de minimus air contaminant source, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
The maximum organic compound solvent content per batch shall not exceed 220 pounds/batch.

B. Operational Restrictions

1. The scrubber water supply pressure shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.
2. The scrubber water flow rate shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.
3. The operation of the control equipment outside of the restrictions established in the Special Terms and Conditions may or may not indicate a mass emission violation. If required by the Ohio EPA, compliance with the mass emission limitations shall be determined by performing concurrent mass emission tests and parameter readings, using US EPA-approved methods and procedures. The results of any required emission tests and parameter readings shall be used in determining whether or not the operation of the control equipment outside of the restrictions specified in the Special Terms and Conditions is indicative of a possible violation of the mass emission limitations.
4. The maximum annual organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the scrubber water supply pressure and scrubber water flow rate while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with deviations as deemed necessary by the permittee.

The permittee shall collect and record the following information each day that the emissions unit is operating:
 - a. The scrubber water flow rate, in gallons per minute.
 - b. The scrubber water supply pressure, in psig.
 - c. A log of the operating time for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - d. The position of the by-pass valve, indicating whether the exhaust stream from the ovens is going to the wet scrubbers.
2. On any day that any photochemically reactive material [as identified in OAC rule 3745-21-01(C)(5)] is employed, the permittee shall collect and record the following information:
 - a. The company identification of each volatile organic solvent material employed.
 - b. The total amount of volatile organic solvent material employed, in pounds.
 - c. The total volatile organic compound emissions from all volatile organic solvents employed, in pounds
 - d. The total number of hours of operation.
 - e. The average hourly volatile organic compound emission rate for all volatile organic solvents employed, (c/d), in pounds per hour (average).
3. The permittee shall maintain monthly records of following information:
 - a. The volatile organic solvent usage rate for each month, in pounds.
 - b. The rolling, 12-month summation of the volatile organic solvent usage rate, in pounds.
4. The permittee shall collect and record the following information each month:
 - a. The number of batches made during the month.
 - b. The VOC solvent content of each batch, in pounds per batch.
 - c. An identification of whether the VOC content of the material employed is photochemically reactive material,
 - d. The total amount of non-PRM solvent sprayed during the month, in pounds.
 - e. The total amount of PRM solvent sprayed during the month, in pounds.
 - f. The monthly VOC emissions calculated as follows for non-PRM materials:
Monthly VOC emissions (lbs/month)
= total solvent sprayed during the month (pounds) * (1- the control efficiency determined during the most recent performance test)
 - g. The monthly VOC emissions calculated as follows for PRM materials:
Monthly VOC emissions (lbs/month)
= total solvent sprayed during the month (pounds)
 - h. The total monthly VOC emissions calculated for non-PRM materials and PRM materials (f+g), in lbs/month.
 - i. The rolling, 12-month VOC emission rate in tons per year

These records shall be summarized at the end of each calendar year to determine the annual VOC emissions.
5. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.c:
 - a. The name and identification of each HAP employed.
 - b. The amount of each HAP employed, in pounds.
 - c. The total individual HAP emissions from each individual HAP employed, in pounds or tons per month.
 - d. The total combined HAP emissions from all HAPs employed, in pounds or tons per month.
 - e. The updated rolling, 12-month summation of emissions for each individual HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - f. The updated rolling, 12-month summation of emissions for the total combined HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on an emission unit - by- emission unit basis.

6. The permittee shall maintain daily records of any day when nonphotochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. All periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - i. The scrubber water flow rate.
 - ii. The scrubber water supply pressure.
 - b. All exceedances of the updated rolling, 12- month summation of the organic solvent usage rate and the updated rolling, 12-month VOC emissions limitations.
 - c. All exceedances of the HAP usage limitations set forth in term A.2.c.
 - d. Each day during which a photochemically reactive material was employed where the VOC emission rate exceeded 8 pounds per hour and/or 40 pounds per day.
 - e. Any day non-photochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.
2. These quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the organic solvent content limit per batch set forth in term A.2.d. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period then a report is required stating so.
4. The permittee shall submit annual PM/PM10 and VOC emissions reports.
5. These annual reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emissions Limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
- Applicable Compliance Method:
Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.
2. Emissions Limitations:
Particulate Emissions (PE) and Particulate Matter 10 microns and less in diameter (PM10) shall not exceed 0.01 lb/hr and 0.04 TPY.
- Applicable Compliance Method:
Compliance shall be determined utilizing the total dry material throughput (in lbs/hr) multiplied by the minimum HEPA control efficiency of 99.97%. The hourly number is then multiplied by 8760 hours per year and divided by 2000 lbs/ton.
3. Emissions Limitations:
Volatile Organic Compound (VOC) emissions shall not exceed 8 lbs/hour and 40 lbs/day when employing photochemically reactive materials.
- Applicable Compliance Method:
Compliance shall be demonstrated by the recordkeeping in section C.2.
4. Emission limitation :
Volatile Organic Compound (VOC) emissions shall not exceed 9.5 lbs/hr when employing nonphotochemically reactive materials.
- Applicable Compliance Method:
Approximately 12 months after permit issuance of this permit to operate, 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 to demonstrate compliance with the allowable mass emissions rate and overall control efficiency for VOC.
 - b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Method 25 of 40 CFR Part 60, Appendix A- if applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.
 - c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.
- 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.)
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 OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/15/95." 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."

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.

5. Emissions Limitation:
Volatile Organic Compound (VOC) emissions shall not exceed 6.0 TPY, based on a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be determined by the record keeping in section C.2.
6. Emissions Limitation:
The maximum annual volatile organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

Applicable Compliance Method:
Compliance shall be determined by the record keeping in section C.3.
7. Compliance with the 12-month rolling HAP limitations outlined in term A.2.c shall be demonstrated by the record keeping in section C.5.
8. Emissions Limitation:
The maximum volatile organic compound solvent content per batch shall not exceed 220 pounds/batch.

Applicable Compliance Method:
Compliance shall be determined by the record keeping in section C.4.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D and E.