Facility ID: 0125040064 Issuance type: Draft State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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 P001
Go to Part II for Emissions Unit P002
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Facility ID: 0125040064 Emissions Unit ID: P001 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
1,000-gallon resin kettle R-1000	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07	Volatile organic compound emissions shall not exceed and 3.95E-03 pounds per gallon and 3.02 tons per year, as a rolling, 12-month summation. See A.2.a-d and B.1- B.4 below.
	OAC rule 3745-17-07(A)(1)	Opacity shall not exceed 20% as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 7.58 pounds per hour.

2. **Additional Terms and Conditions**

   (a) Usage of any single HAP shall not exceed 42% of the total OC employed by this emissions unit.
   Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.
   Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.
   The pound of VOC per gallon of resin emission limit established in A.1 above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 24, 1998.

B. **Operational Restrictions**

1. The maximum annual production rate for this emissions unit shall not exceed 1,528,300 gallons, based upon a rolling, 12-month summation of the production rates.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

   Month Maximum Allowable Cumulative Production(gallons)

   1 152,830
   1-2 305,660
   1-3 458,490

1-4 611,320
1-5 764,150
1-6 916,980
1-7 1,069,810
1-8 1,222,640
1-9 1,375,470
1-10 1,528,300
1-11 1,528,300
1-12 1,528,300

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12 month summation of the production rates.

2. The condenser controlling VOC emissions from this emissions unit shall operate at a minimum control efficiency of not less than 51% when the emissions unit is in operation.

3. The pressure drop across the venturi scrubber shall be continuously maintained at a value of not less than three inches of water at all times while the emissions unit is in operation.

   The venturi scrubber water flow rate shall be continuously maintained at a value of not less than 120 gallons per minute at all times while the emissions unit is in operation.

4. The average temperature of the exhaust gases from the condenser, for any 3-hour block of time, shall not be greater than 101 degrees Fahrenheit when the emissions unit is in operation.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

   a. The pressure drop across the scrubber, in inches of water, on an hourly basis.

   b. The scrubber water flow rate, in gallons per minute, on an hourly basis.

   c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

   a. The average temperature of the exhaust gases from the condenser during each of the 8 3-hour blocks of time during the day.

   b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

3. The permittee shall maintain the following daily records:

   a. Number of gallons of throughput.

   b. Number of hours of operation.

   c. The calculated controlled hourly emission rate , in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the average hourly throughput (3a/3b).

   d. The calculated controlled daily OC emission rate, in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the daily throughput (3a).

   e. The maximium amount of each individual HAP employed, as a percentage of the total OC employed during the day.

   f. The total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002, in pounds.

   g. The total emissions of VOC from emissions units P365-P370, J002, P001 and P002, in pounds.

4. The permittee shall maintain the following monthly records:

   a. Total number of gallons of throughput.

   b. The rolling, 12-month summation of gallons of throughput for this emissions unit.

5. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 24, 1998 and shall be calculated using an

overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

   a. The static pressure drop across the scrubber.

   b. The scrubber water flow rate.

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels.

3. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified above.

4. The permittee shall submit deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .

   b. An identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

   c. An identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.

5. The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximium amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002. These reports shall be submitted by January 31 of each year.

6. On a quarterly basis, the permitee shall submit the results of the pound of VOC per gallon of resin emission rate analysis required by C.4 above.

E. **Testing Requirements**

1. Emission limitation: Particulate Emissions shall not exceed 7.58 pounds per hour.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C and the emission testing requirement specified below.

   The permittee shall conduct, or have conducted, PM emission testing for this emissions unit to demonstrate compliance with the 7.58 pounds per hour emission limitation in accordance with the following requirements:

   i. The emission testing shall be conducted within 6 months prior to permit renewal.

   ii. The following test method(s) shall be employed to determine the mass rate of particulate emissions from this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 5.

   iii. The test(s) shall be conducted while emissions units P001 and P002 are venting PM emissions to the scrubber. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

   Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

3. Emission limitation:Organic compound emissions shall not exceed 8 pounds per hour.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

4. Emission limitation: Organic compound emissions shall not exceed 40 pounds per day.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

5. Emission limitation: Volatile organic compound emissions shall not exceed 3.95E-03 pound per gallon of resin.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the emissions analysis required by C.4 above.

6. Emission limitation: Volatile organic compound emissions shall not exceed 3.02 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from C.3.d above.

7. Emission limitations: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit during any day and emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

8. Emission limitation: 51% control efficiency for the condenser

   Applicable Compliance Method: Compliance with this efficiency limitation shall be demonstrated through the emission testing requirement specified below.

   The permittee shall conduct, or have conducted, VOC emissions testing for this emissions unit to demonstrate compliance with the 51% control efficiency requirement in accordance with the following requirements:

   a. The emissions testing shall be conducted within 3 months of permit issuance.

   b. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

   c. The test(s) shall be conducted while this emissions units is venting VOC emissions to the condenser. This emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

9. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

   Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

10. In lieu of conducting the emissions testing required above to demonstrate compliance with the 51% control efficiency requirement, the permittee may instead conduct emissions testing for emissions unit P002.

11. Emission limitation:Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.

    Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

F. **Miscellaneous Requirements**

1. None

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Facility ID: 0125040064 Emissions Unit ID: P002 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
2,000-gallon resin kettle R-2000	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07	Volatile organic compound emissions shall not exceed 3.95E-03 pounds per gallon and 2.71 tons per year, as a rolling, 12-month summation. See A.2.a-d and B.1- B.4 below.
	OAC rule 3745-17-07(A)(1)	Opacity shall not exceed 20% as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 13.6 pounds per hour.

2. **Additional Terms and Conditions**

(a) Usage of any single HAP shall not exceed 42% of the total OC employed by this emissions unit.
Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.
Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.
The pound of VOC per gallon of resin emission limit established in A.1 above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 24, 1998.

B. **Operational Restrictions**

1. The maximum annual production rate for this emissions unit shall not exceed 1,371,700 gallons, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Month Maximum Allowable Cumulative Production(gallons)

1 137,170
1-2 274,340
1-3 411,510
1-4 548,680
1-5 685,850
1-6 823,020
1-7 960,190
1-8 1,097,360
1-9 1,234,530
1-10 1,371,700
1-11 1,371,700
1-12 1,371,700

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12 month summation of the production rates.

2. The condenser controlling VOC emissions from this emissions unit shall operate at a minimum control efficiency of not less than 51% when the emissions unit is in operation.

3. The pressure drop across the venturi scrubber shall be continuously maintained at a value of not less than three inches of water at all times while the emissions unit is in operation.

The venturi scrubber water flow rate shall be continuously maintained at a value of not less than 120 gallons per minute at all times while the emissions unit is in operation.

4. The average temperature of the exhaust gases from the condenser, for any 3-hour block of time, shall not be greater than 101 degrees Fahrenheit when the emissions unit is in operation.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

a. The pressure drop across the scrubber, in inches of water, on an hourly basis.

b. The scrubber water flow rate, in gallons per minute, on an hourly basis.

c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

   a. The average temperature of the exhaust gases from the condenser during each of the 8 3-hour blocks of time during the day.

   b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

3. The permittee shall maintain the following daily records:

   a. Number of gallons of throughput.

   b. Number of hours of operation.

   c. The calculated controlled hourly emission rate , in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the average hourly throughput (3a/3b).

   d. The calculated controlled daily OC emission rate, in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the daily throughput (3a).

   e. The maximium amount of each individual HAP employed, as a percentage of the total OC employed during the day.

   f. The total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002, in pounds.

   g. The total emissions of VOC from emissions units P365-P370, J002, P001 and P002, in pounds.

4. The permittee shall maintain the following monthly records:

   a. Total number of gallons of throughput.

   b. The rolling, 12-month summation of gallons of throughput for this emissions unit.

5. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 24, 1998 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

   a. The static pressure drop across the scrubber.

   b. The scrubber water flow rate.

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels.

3. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified above.

4. The permittee shall submit deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .

   b. An identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

   c. An identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.

5. The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximium amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002. These reports shall be submitted by January 31 of each year.

6. On a quarterly basis, the permitee shall submit the results of the pound of VOC per gallon of resin emission rate analysis required by C.4 above.

E. **Testing Requirements**

1. Emission limitation: Particulate Emissions shall not exceed 13.6 pounds per hour.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C and the emission testing requirement specified below.

   The permittee shall conduct, or have conducted, PM emission testing for this emissions unit to demonstrate compliance with the 13.6 pounds per hour emission limitation in accordance with the following requirements:

   i. The emission testing shall be conducted within 6 months prior to permit renewal.

   ii. The following test method(s) shall be employed to determine the mass rate of particulate emissions from this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 5.

   iii. The test(s) shall be conducted while emissions units P001 and P002 are venting PM emissions to the scrubber. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

   Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

3. Emission limitation:Organic compound emissions shall not exceed 8 pounds per hour.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

4. Emission limitation: Organic compound emissions shall not exceed 40 pounds per day.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

5. Emission limitation: Volatile organic compound emissions shall not exceed 3.95E-03 pound per gallon of resin.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the emissions analysis required by C.4 above.

6. Emission limitation: Volatile organic compound emissions shall not exceed 2.71 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from C.3.d above.

7. Emission limitations: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit during any day and emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

8. Emission limitation: 51% control efficiency for the condenser

   Applicable Compliance Method: If required, compliance with this efficiency limitation shall be demonstrated through the following test method(s): 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

9. Emission limitation:Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

F. **Miscellaneous Requirements**

1. None

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
2,000-gallon letdown tank TD-1100	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07	Volatile organic compound emissions shall not exceed 3.73E-04 pound per gallon of resin and .15 ton per year, as a rolling, 12-month summation. See A.2.a-d and B.1-5 below.

2. **Additional Terms and Conditions**

(a) Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.
Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.
Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.
The pound of VOC per gallon of resin emission limit established in A.1 above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 24, 1998.

B. **Operational Restrictions**

1. The rolling, 12-month production rate for this emissions unit shall not exceed 794,600 gallons of resin.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Month Maximum Allowable Cumulative Production (gallons of resin)

1 79,460
1-2 158,920
1-3 238,380
1-4 317,840
1-5 397,300
1-6 476,760
1-7 556,220
1-8 635,680
1-9 715,140
1-10 794,600
1-11 794,600
1-12 794,600

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1350 degrees Fahrenheit.

3. The condenser controlling VOC emissions from this emissions unit shall operate at a minimum control efficiency of not less than 51% when the emissions unit is in operation.

4. The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

5. The average temperature of the exhaust gases from the condenser, for any 3-hour block of time, shall not be greater than 272 degrees Fahrenheit when the emissions unit is in operation.

C. **Monitoring and/or Record Keeping Requirements**

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

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

   a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit.

   b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

   a. The average temperature of the exhaust gases from the condenser during each of the 8 3-hour blocks of time during the day.

   b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

3. The permittee shall maintain the following daily records:

   a. Number of gallons of throughput.

   b. Number of hours of operation.

   c. The calculated controlled hourly emission rate , in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the average hourly throughput (3a/3b).

   d. The calculated controlled daily OC emission rate, in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the daily throughput (3a).

   e. The maximium amount of each individual HAP employed, as a percentage of the total OC employed during the day.

   f. The total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002, in pounds.

   g. The total emissions of VOC from emissions units P365-P370, J002, P001 and P002, in pounds.

4. The permittee shall maintain the following monthly records:

   a. Total number of gallons of throughput.

   b. The rolling, 12-month summation of gallons of throughput for this emissions unit.

5. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 24, 1998 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels.

2. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.

3. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified above.

4. The permittee shall submit deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .

   b. An identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

c. An identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.

5. The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximium amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002. These reports shall be submitted by January 31 of each year.

6. On a quarterly basis, the permitee shall submit the results of the pound of VOC per gallon of resin emission rate analysis required by C.4 above.

E. **Testing Requirements**

1. Emission limitation: 97.55% destruction.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emission testing requirement specified below.

   The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to demonstrate compliance with the 97.55 % destruction requirement in accordance with the following requirements:

   a. The emission testing shall be conducted within 6 months prior to permit renewal.

   b. The following test method(s) shall be employed to determine the control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

   c. The test(s) shall be conducted while emissions units P365-P370 and J002 are venting VOC emissions to the thermal incinerator. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

   Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

3. Emission limitation:Organic compound emissions shall not exceed 8 pounds per hour.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

4. Emission limitation: Organic compound emissions shall not exceed 40 pounds per day.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

5. Emission limitation: Volatile organic compound emissions shall not exceed 3.73E-04 pound per gallon of resin.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the emissions analysis required by C.4 above.

6. Emission limitation: Volatile organic compound emissions shall not exceed .15 ton per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from C.3.d above.

7. Emission limitations: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit during any day and emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

8. Emission limitation: 51% control efficiency for the condenser

   Applicable Compliance Method: Compliance with this efficiency limitation shall be demonstrated through the emission testing requirement specified below.

   The permittee shall conduct, or have conducted, VOC emissions testing for this emissions unit to demonstrate

compliance with the 51% control efficiency requirement in accordance with the following requirements:

a. The emissions testing shall be conducted within 3 months of permit issuance.

b. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

c. The test(s) shall be conducted while this emissions units is venting VOC emissions to the condenser. This emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

9. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

10. In lieu of conducting the emissions testing required above to demonstrate compliance with the 51% control efficiency requirement, the permittee may instead conduct emissions testing for emissions unit P368.

11. Emission limitation:Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

F. **Miscellaneous Requirements**

1. None

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

Facility ID: 0125040064 Emissions Unit ID: Z002 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
2,400-gallon letdown tank TD-1200	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07	Volatile organic compound emissions shall not exceed 3.73E-04 pound per gallon of resin and .14 ton per year, as a rolling, 12-month summation.
		See A.2.a-d and B.1-5 below.

2. **Additional Terms and Conditions**

(a) Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.

Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.
Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.
The pound of VOC per gallon of resin emission limit established in A.1 above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 24, 1998.

B. **Operational Restrictions**

1. The rolling, 12-month production rate for this emissions unit shall not exceed 733,370 gallons of resin.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

   Month Maximum Allowable Cumulative Production (gallons of resin)

   1 73,370
   1-2 146,740
   1-3 220,110
   1-4 293,480
   1-5 366,850
   1-6 440,220
   1-7 513,590
   1-8 586,960
   1-9 660,330
   1-10 733,370
   1-11 733,370
   1-12 733,370

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1350 degrees Fahrenheit.

3. The condenser controlling VOC emissions from this emissions unit shall operate at a minimum control efficiency of not less than 51% when the emissions unit is in operation.

4. The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

5. The average temperature of the exhaust gases from the condenser, for any 3-hour block of time, shall not be greater than 272 degrees Fahrenheit when the emissions unit is in operation.

C. **Monitoring and/or Record Keeping Requirements**

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

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

   a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit.

   b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

   a. The average temperature of the exhaust gases from the condenser during each of the 8 3-hour blocks of time during the day.

   b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

3. The permittee shall maintain the following daily records:

   a. Number of gallons of throughput.

   b. Number of hours of operation.

   c. The calculated controlled hourly emission rate , in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the average hourly throughput (3a/3b).

d. The calculated controlled daily OC emission rate, in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the daily throughput (3a).

e. The maximium amount of each individual HAP employed, as a percentage of the total OC employed during the day.

f. The total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002, in pounds.

g. The total emissions of VOC from emissions units P365-P370, J002, P001 and P002, in pounds.

4. The permittee shall maintain the following monthly records:

a. Total number of gallons of throughput.

b. The rolling, 12-month summation of gallons of throughput for this emissions unit.

5. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 24, 1998 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels.

2. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.

3. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified above.

4. The permittee shall submit deviation (excursion) reports which include the following information:

a. An identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .

b. An identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

c. An identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.

5. The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximium amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002. These reports shall be submitted by January 31 of each year.

6. On a quarterly basis, the permitee shall submit the results of the pound of VOC per gallon of resin emission rate analysis required by C.4 above.

E. **Testing Requirements**

1. Emission limitation: 97.55% destruction.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emission testing requirement specified below.

The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to demonstrate compliance with the 97.55 % destruction requirement in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit renewal.

b. The following test method(s) shall be employed to determine the control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

c. The test(s) shall be conducted while emissions units P365-P370 and J002 are venting VOC emissions to the thermal incinerator. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

3. Emission limitation:Organic compound emissions shall not exceed 8 pounds per hour.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

4. Emission limitation: Organic compound emissions shall not exceed 40 pounds per day.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

5. Emission limitation: Volatile organic compound emissions shall not exceed 3.73E-04 pound per gallon of resin.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the emissions analysis required by C.4 above.

6. Emission limitation: Volatile organic compound emissions shall not exceed .14 ton per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from C.3.d above.

7. Emission limitations: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit during any day and emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

8. Emission limitation: 51% control efficiency for the condenser

   Applicable Compliance Method: If required, compliance with this efficiency limitation shall be demonstrated through the following test method(s): 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

9. Emission limitation:Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

F. **Miscellaneous Requirements**

1. None

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

Facility ID: 0125040064 Emissions Unit ID: Z003 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
3,600-gallon letdown tank	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8

TD-2300		pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07	Volatile organic compound emissions shall not exceed 3.73E-04 pound per gallon of resin and .13 ton per year, as a rolling, 12-month summation. See A.2.a-d and B.1-5 below.

2. **Additional Terms and Conditions**

(a) Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.
Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.
Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.
The pound of VOC per gallon of resin emission limit established in A.1 above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 24, 1998.

B. **Operational Restrictions**

1. The rolling, 12-month production rate for this emissions unit shall not exceed 685,850 gallons of resin.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Month Maximum Allowable Cumulative Production (gallons of resin)

1 68,585
1-2 137,170
1-3 205,755
1-4 274,340
1-5 342,925
1-6 411,510
1-7 480,095
1-8 548,680
1-9 617,265
1-10 685,850
1-11 685,850
1-12 685,850

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1350 degrees Fahrenheit.

3. The condenser controlling VOC emissions from this emissions unit shall operate at a minimum control efficiency of not less than 51% when the emissions unit is in operation.

4. The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

5. The average temperature of the exhaust gases from the condenser, for any 3-hour block of time, shall not be greater than 272 degrees Fahrenheit when the emissions unit is in operation.

C. **Monitoring and/or Record Keeping Requirements**

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

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

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

a. The average temperature of the exhaust gases from the condenser during each of the 8 3-hour blocks of time during the day.

b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

3. The permittee shall maintain the following daily records:

   a. Number of gallons of throughput.

   b. Number of hours of operation.

   c. The calculated controlled hourly emission rate , in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the average hourly throughput (3a/3b).

   d. The calculated controlled daily OC emission rate, in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the daily throughput (3a).

   e. The maximium amount of each individual HAP employed, as a percentage of the total OC employed during the day.

   f. The total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002, in pounds.

   g. The total emissions of VOC from emissions units P365-P370, J002, P001 and P002, in pounds.

4. The permittee shall maintain the following monthly records:

   a. Total number of gallons of throughput.

   b. The rolling, 12-month summation of gallons of throughput for this emissions unit.

5. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 24, 1998 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels.

2. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.

3. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified above.

4. The permittee shall submit deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .

   b. An identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

   c. An identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.

5. The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximium amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002. These reports shall be submitted by January 31 of each year.

6. On a quarterly basis, the permitee shall submit the results of the pound of VOC per gallon of resin emission rate analysis required by C.4 above.

E. **Testing Requirements**

1. Emission limitation: 97.55% destruction.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emission testing requirement specified below.

   The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to demonstrate compliance with the 97.55 % destruction requirement in accordance with the following requirements:

   a. The emission testing shall be conducted within 6 months prior to permit renewal.

   b. The following test method(s) shall be employed to determine the control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

   c. The test(s) shall be conducted while emissions units P365-P370 and J002 are venting VOC emissions to the thermal incinerator. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

   Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

3. Emission limitation:Organic compound emissions shall not exceed 8 pounds per hour.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

4. Emission limitation: Organic compound emissions shall not exceed 40 pounds per day.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

5. Emission limitation: Volatile organic compound emissions shall not exceed 3.73E-04 pound per gallon of resin.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the emissions analysis required by C.4 above.

6. Emission limitation: Volatile organic compound emissions shall not exceed .13 ton per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from C.3.d above.

7. Emission limitations: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit during any day and emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

8. Emission limitation: 51% control efficiency for the condenser

   Applicable Compliance Method: Compliance with this efficiency limitation shall be demonstrated through the emission testing requirement specified below.

   The permittee shall conduct, or have conducted, VOC emissions testing for this emissions unit to demonstrate compliance with the 51% control efficiency requirement in accordance with the following requirements:

   a. The emissions testing shall be conducted within 3 months of permit issuance.

   b. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

   c. The test(s) shall be conducted while this emissions units is venting VOC emissions to the condenser. This emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

9. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

   Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

10. In lieu of conducting the emissions testing required above to demonstrate compliance with the 51% control efficiency requirement, the permittee may instead conduct emissions testing for emissions unit P370.

11. Emission limitation:Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed

6.33 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

F. **Miscellaneous Requirements**

1. None

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

Facility ID: 0125040064 Emissions Unit ID: Z004 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
3,600-gallon letdown tank TD-2400	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07	Volatile organic compound emissions shall not exceed 3.73E-04 pound per gallon of resin and .13 ton per year, as a rolling, 12-month summation. See A.2.a-d and B.1-5 below.

2. **Additional Terms and Conditions**

(a) Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.
Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.
Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.
The pound of VOC per gallon of resin emission limit established in A.1 above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 24, 1998.

B. **Operational Restrictions**

1. The rolling, 12-month production rate for this emissions unit shall not exceed 685,850 gallons of resin.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Month Maximum Allowable Cumulative Production (gallons of resin)

1 68,585
1-2 137,170
1-3 205,755
1-4 274,340
1-5 342,925
1-6 411,510
1-7 480,095
1-8 548,680
1-9 617,265
1-10 685,850
1-11 685,850
1-12 685,850

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1350 degrees Fahrenheit.

3. The condenser controlling VOC emissions from this emissions unit shall operate at a minimum control efficiency of not less than 51% when the emissions unit is in operation.

4. The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

5. The average temperature of the exhaust gases from the condenser, for any 3-hour block of time, shall not be greater than 272 degrees Fahrenheit when the emissions unit is in operation.

C. **Monitoring and/or Record Keeping Requirements**

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

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

   a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit.

   b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

   a. The average temperature of the exhaust gases from the condenser during each of the 8 3-hour blocks of time during the day.

   b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

3. The permittee shall maintain the following daily records:

   a. Number of gallons of throughput.

   b. Number of hours of operation.

   c.The calculated controlled hourly emission rate , in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the average hourly throughput (3a/3b).

   d. The calculated controlled daily OC emission rate, in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the daily throughput (3a).

   e. The maximium amount of each individual HAP employed, as a percentage of the total OC employed during the day.

   f. The total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002, in pounds.

   g. The total emissions of VOC from emissions units P365-P370, J002, P001 and P002, in pounds.

4. The permittee shall maintain the following monthly records:

   a. Total number of gallons of throughput.

   b. The rolling, 12-month summation of gallons of throughput for this emissions unit.

5. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 24, 1998 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels.

2. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.

3. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified above.

4. The permittee shall submit deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .

   b. An identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

   c. An identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.

5. The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximium amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002. These reports shall be submitted by January 31 of each year.

6. On a quarterly basis, the permitee shall submit the results of the pound of VOC per gallon of resin emission rate analysis required by C.4 above.

E. **Testing Requirements**

1. Emission limitation: 97.55% destruction.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emission testing requirement specified below.

   The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to demonstrate compliance with the 97.55 % destruction requirement in accordance with the following requirements:

   a. The emission testing shall be conducted within 6 months prior to permit renewal.

   b. The following test method(s) shall be employed to determine the control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

   c. The test(s) shall be conducted while emissions units P365-P370 and J002 are venting VOC emissions to the thermal incinerator. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

   Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

3. Emission limitation:Organic compound emissions shall not exceed 8 pounds per hour.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

4. Emission limitation: Organic compound emissions shall not exceed 40 pounds per day.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

5. Emission limitation: Volatile organic compound emissions shall not exceed 3.73E-04 pound per gallon of resin.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the emissions analysis required by C.4 above.

6. Emission limitation: Volatile organic compound emissions shall not exceed .13 ton per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from C.3.d above.

7. Emission limitations: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit during any day and emissions of each individual HAP from emissions units P365-P370, J002,

P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

8. Emission limitation: 51% control efficiency for the condenser

Applicable Compliance Method: If required, compliance with this efficiency limitation shall be demonstrated through the following test method(s): 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

9. Emission limitation:Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

F. **Miscellaneous Requirements**

1. None

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

Facility ID: 0125040064 Emissions Unit ID: Z005 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Weigh tank # 1	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07	Volatile organic compound emissions shall not exceed 2.55E-05 pound per gallon of resin and .0195 ton per year, as a rolling, 12-month summation. See A.2.a-d and B.1-3 below.

2. **Additional Terms and Conditions**

(a) Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.
Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.
Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.
The pound of VOC per gallon of resin emission limit established in A.1 above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 24, 1998.

B. **Operational Restrictions**

1. The rolling, 12-month production rate for this emissions unit shall not exceed 1,528,300 gallons of resin.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Month Maximum Allowable Cumulative Production (gallons of resin)

1 152,830
1-2 305,660
1-3 458,490
1-4 611,320

1-5 764,150
1-6 916,980
1-7 1,069,810
1-8 1,222,640
1-9 1,375,470
1-10 1,528,300
1-11 1,528,300
1-12 1,528,300

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1350 degrees Fahrenheit.

3. The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

C. **Monitoring and/or Record Keeping Requirements**

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

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

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall maintain the following daily records:

a. Number of gallons of throughput.

b. Number of hours of operation.

c. The calculated controlled hourly emission rate , in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the average hourly throughput (2a/2b).

d. The calculated controlled daily OC emission rate, in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the daily throughput (2a).

e. The maximium amount of each individual HAP employed, as a percentage of the total OC employed during the day.

f. The total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002, in pounds.

g. The total emissions of VOC from emissions units P365-P370, J002, P001 and P002, in pounds.

3. The permittee shall maintain the following monthly records:

a. Total number of gallons of throughput.

b. The rolling, 12-month summation of gallons of throughput for this emissions unit.

4. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 24, 1998 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels.

2. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.

3. The permittee shall submit deviation (excursion) reports which include the following information:

a. An identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .

b. An identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

c. An identification of each day during which the usage of any individual HAP exceeded 42% of the total OC

employed by this emissions unit and the actual percentage of the total OC employed for each such day.

4. The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximium amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002. These reports shall be submitted by January 31 of each year.

5. On a quarterly basis, the permitee shall submit the results of the pound of VOC per gallon of resin emission rate analysis required by C.4 above.

E. **Testing Requirements**

1. Emission limitation: 97.55% destruction.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emission testing requirement specified below.

   The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to demonstrate compliance with the 97.55 % destruction requirement in accordance with the following requirements:

   a. The emission testing shall be conducted within 6 months prior to permit renewal.

   b. The following test method(s) shall be employed to determine the control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

   c. The test(s) shall be conducted while emissions units P365-P370 and J002 are venting VOC emissions to the thermal incinerator. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

   Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

3. Emission limitation:Organic compound emissions shall not exceed 8 pounds per hour.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

4. Emission limitation: Organic compound emissions shall not exceed 40 pounds per day.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

5. Emission limitation: Volatile organic compound emissions shall not exceed 2.55E-05 pound per gallon of resin.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the emissions analysis required by C.4 above.

6. Emission limitation: Volatile organic compound emissions shall not exceed .0195 ton per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from C.3.d above.

7. Emission limitations: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit during any day and emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

8. Emission limitation:Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

F. **Miscellaneous Requirements**

1. None

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Facility ID: 0125040064 Emissions Unit ID: Z006 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Weigh tank # 2	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07	Volatile organic compound emissions shall not exceed 2.55E-05 pound per gallon of resin and .0175 ton per year, as a rolling, 12-month summation. See A.2.a-d and B.1-3 below.

2. **Additional Terms and Conditions**

   (a) Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.
   Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.
   Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.
   The pound of VOC per gallon of resin emission limit established in A.1 above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 24, 1998.

B. **Operational Restrictions**

1. The rolling, 12-month production rate for this emissions unit shall not exceed 1,371,700 gallons of resin.

   To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

   Month Maximum Allowable Cumulative Production (gallons of resin)

   1 137,170
   1-2 274,340
   1-3 411,510
   1-4 548,680
   1-5 685,850
   1-6 823,020
   1-7 960,190
   1-8 1,097,360
   1-9 1,234,530
   1-10 1,371,700
   1-11 1,371,700
   1-12 1,371,700

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1350 degrees Fahrenheit.

3. The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

C. **Monitoring and/or Record Keeping Requirements**

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

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

   a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit.

   b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall maintain the following daily records:

   a. Number of gallons of throughput.

   b. Number of hours of operation.

   c. The calculated controlled hourly emission rate , in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the average hourly throughput (2a/2b).

   d. The calculated controlled daily OC emission rate, in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the daily throughput (2a).

   e. The maximium amount of each individual HAP employed, as a percentage of the total OC employed during the day.

   f. The total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002, in pounds.

   g. The total emissions of VOC from emissions units P365-P370, J002, P001 and P002, in pounds.

3. The permittee shall maintain the following monthly records:

   a. Total number of gallons of throughput.

   b. The rolling, 12-month summation of gallons of throughput for this emissions unit.

4. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 24, 1998 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels.

2. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.

3. The permittee shall submit deviation (excursion) reports which include the following information:

   a. An identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .

   b. An identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

   c. An identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.

4. The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximium amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002. These reports shall be submitted by January 31 of each year.

5. On a quarterly basis, the permitee shall submit the results of the pound of VOC per gallon of resin emission rate analysis required by C.4 above.

E. **Testing Requirements**

1. Emission limitation: 97.55% destruction.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emission testing requirement specified below.

   The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to demonstrate

compliance with the 97.55 % destruction requirement in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit renewal.

b. The following test method(s) shall be employed to determine the control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

c. The test(s) shall be conducted while emissions units P365-P370 and J002 are venting VOC emissions to the thermal incinerator. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

   Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

3. Emission limitation:Organic compound emissions shall not exceed 8 pounds per hour.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

4. Emission limitation: Organic compound emissions shall not exceed 40 pounds per day.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

5. Emission limitation: Volatile organic compound emissions shall not exceed 2.55E-05 pound per gallon of resin.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the emissions analysis required by C.4 above.

6. Emission limitation: Volatile organic compound emissions shall not exceed .0175 ton per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from C.3.d above.

7. Emission limitations: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit during any day and emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

8. Emission limitation:Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

F. **Miscellaneous Requirements**

1. None

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Facility ID: 0125040064 Emissions Unit ID: Z007 Issuance type: Draft 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
loading Rack LR-1	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds per day.
	OAC rule 3745-35-07	Volatile organic compound emissions shall not exceed 1.04E-03 pound per gallon of resin and .01 ton per year, as a rolling, 12-month summation. See A.2.a-d and B.1-3 below.

2. **Additional Terms and Conditions**

(a) Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit.
Emissions of any individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.
Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.
The pound of VOC per gallon of resin emission limit established in A.1 above is based upon a worst case analysis of the product produced by this emissions unit as described in the permit application submitted on February 24, 1998.

B. **Operational Restrictions**

1. The rolling, 12-month production rate for this emissions unit shall not exceed 20,000 gallons of resin.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Month Maximum Allowable Cumulative Production (gallons of resin)

1 2,000
1-2 4,000
1-3 6,000
1-4 8,000
1-5 10,000
1-6 12,000
1-7 14,000
1-8 16,000
1-9 18,000
1-10 20,000
1-11 20,000
1-12 20,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1350 degrees Fahrenheit.

3. The thermal incinerator controlling VOC emissions from this emissions unit shall operate at a minimum control (destruction) efficiency of not less than 97.55% when the emissions unit is in operation.

C. **Monitoring and/or Record Keeping Requirements**

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

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

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall maintain the following daily records:

a. Number of gallons of throughput.

b. Number of hours of operation.

c.The calculated controlled hourly emission rate , in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the average hourly throughput (2a/2b).

d. The calculated controlled daily OC emission rate, in pounds. The controlled OC emission rate shall be calculated using the pound of VOC per gallon of resin emission rate in A.1 above multiplied by the daily throughput (2a).

e. The maximium amount of each individual HAP employed, as a percentage of the total OC employed during the day.

f. The total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002, in pounds.

g. The total emissions of VOC from emissions units P365-P370, J002, P001 and P002, in pounds.

3. The permittee shall maintain the following monthly records:

a. Total number of gallons of throughput.

b. The rolling, 12-month summation of gallons of throughput for this emissions unit.

4. The permittee shall recalculate, on a quarterly basis, the worst case controlled VOC emission rate, in pounds per gallon of resin. This VOC emission rate shall be calculated using methodology consistent with that employed in the permit application submitted for this emissions unit on February 24, 1998 and shall be calculated using an overall control efficiency determined during the most recent emissions testing which demonstrated that the emissions unit was in compliance.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production levels.

2. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.

3. The permittee shall submit deviation (excursion) reports which include the following information:

a. An identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .

b. An identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

c. An identification of each day during which the usage of any individual HAP exceeded 42% of the total OC employed by this emissions unit and the actual percentage of the total OC employed for each such day.

4. The permittee shall also submit annual reports which a) specify the total VOC emissions from this emissions unit for the previous calendar year, b) specify the maximium amount of individual HAP employed as a percentage of the total OC employed during any day, c) specify the total annual throughput of resin, d) specify the total emissions of VOC from emissions units P365-P370, J002, P001 and P002, and e) specify the total emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002. These reports shall be submitted by January 31 of each year.

5. On a quarterly basis, the permitee shall submit the results of the pound of VOC per gallon of resin emission rate analysis required by C.4 above.

E. **Testing Requirements**

1. Emission limitation: 97.55% destruction.

Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the emission testing requirement specified below.

The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to demonstrate compliance with the 97.55 % destruction requirement in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit renewal.

b. The following test method(s) shall be employed to determine the control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A.

c. The test(s) shall be conducted while emissions units P365-P370 and J002 are venting VOC emissions to the thermal incinerator. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

3. Emission limitation:Organic compound emissions shall not exceed 8 pounds per hour.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

4. Emission limitation: Organic compound emissions shall not exceed 40 pounds per day.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the records required pursuant to section C.3.

5. Emission limitation: Volatile organic compound emissions shall not exceed 1.04E-03 pound per gallon of resin.

   Applicable Compliance Method:
   Compliance with this emission limitation shall be demonstrated through the emissions analysis required by C.4 above.

6. Emission limitation: Volatile organic compound emissions shall not exceed .01 ton per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through the summation of the values obtained from C.3.d above.

7. Emission limitations: Usage of any individual HAP shall not exceed 42% of the total OC employed by this emissions unit during any day and emissions of each individual HAP from emissions units P365-P370, J002, P001 and P002 shall not exceed 2.67 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

8. Emission limitation:Emissions of VOC from emission units P365-P370, J002, P001 and P002 shall not exceed 6.33 tons per year, as a rolling, 12-month summation.

   Applicable Compliance Method: Compliance with these emission limitations shall be demonstrated through the records required pursuant to section C.3.

F. **Miscellaneous Requirements**

1. None