

Facility ID: 1677010196 Issuance type: Final 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.

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Facility ID: 1677010196 Emissions Unit ID: P006 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pilot scale research/production development of emulsion polymers using butadiene & styrene monomers	OAC rule 3745-31-05 (A)(3) (PTI 16-02188)  OAC rule 3745-21-07 (G)(2)	4.0 pounds/hour of OCs; 26.5 pounds/day of OCs; and 0.8 ton/year of OCs  The OC emission limitations required by OAC rule 3745-21-07 (G)(2) are less stringent than the OC emission limitations established pursuant to OAC rule 3745-31-05 (A)(3).

**2. Additional Terms and Conditions**

- (a) As determined from the application, the OC emission limitations regulated per OAC rule 3745-31-05 (A) (3) are based upon the controlled (flare & condenser operating) potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with process raw materials, latex formulations, polymerization efficiency, monomer contents, production capacity, cleanup materials, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s). The permittee shall properly install (or have installed), adjust, operate, and maintain, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), a condenser, or comparable air pollution control device, to reduce air emissions of styrene from this emissions unit. Furthermore, the permittee shall properly install (or have installed), adjust, operate, and maintain, in accordance with good engineering design and practice, hoods, ducts, fans, and any other equipment necessary to capture, contain, and vent air emissions of styrene to the applicable air pollution control device. The permittee shall properly install (or have installed), adjust, operate, and maintain, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), a flare, or comparable air pollution control device, to reduce air emissions of OCs from this emissions unit. Furthermore, the permittee shall properly install (or have installed), adjust, operate, and maintain, in accordance with good engineering design and practice, hoods, ducts, fans, and any other equipment necessary to capture, contain, and vent air emissions of OCs to the applicable air pollution control device. The condensate from the condenser shall be properly identified and collected in a closed vessel and transferred to a closed storage drum for appropriate off-site disposal. All raw/discarded process materials and clean/used cleanup solvents shall be properly identified and held in closed storage vessels or closed containers at all times when not in use or for appropriate off-site disposal.

**B. Operational Restrictions**

1. The condenser and flare shall be employed at all times the emissions unit is in operation.
2. The average temperature of the exhaust gases from the condenser, for any 3-hour block of time, shall not be greater than 95 degrees Fahrenheit.
3. The arcing of the flare's electric arc ignition system shall pulse continually.

**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 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.
2. The permittee shall properly install, operate, and maintain a device to continuously monitor the electric arc ignition system when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record the following information each day:

- a. All periods during which the electric arc system was inoperable.
- b. The operating times for the flare, monitoring equipment, and the associated emissions unit.

**D. Reporting Requirements**

1. 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.
2. The permittee shall submit deviation (excursion) reports that identify all periods during which the electric arc ignition system was not functioning properly. The reports shall include the date, time, and duration of each such period.
3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

**E. Testing Requirements**

1. Compliance with the above OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "P006 Emulsion Pilot Plant Calculations" by RJ DiMascio (revised 11/28/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 1677010196 Emissions Unit ID: P011 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.

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

(a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pilot scale distillation of isoprene to remove unwanted dimer contamination	OAC rule 3745-31-05 (A)(3) (PTI 16-02188)	5.5 pounds/hour of OCs; 35.6 pounds/day of OCs; and 1.7 tons/year of OCs
	OAC rule 3745-21-07 (G)(2)	The OC emission limitations required by OAC rule 3745-21-07 (G)(2) are less stringent than the OC emission limitations established pursuant to OAC rule 3745-31-05 (A)(3).

**2. Additional Terms and Conditions**

- (a) As determined from the application, the OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) are based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with process raw materials, production capacity, cleanup materials, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s). All raw/discarded process materials and clean/used cleanup solvents shall be properly identified and held in closed storage vessels or closed containers at all times when not in use or for appropriate off-site disposal.

**B. Operational Restrictions**

1. None

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

1. None

**D. Reporting Requirements**

1. None

**E. Testing Requirements**

1. Compliance with the above OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP Isoprene Still PTE" by RJ DiMascio (9/17/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 1677010196 Emissions Unit ID: P012 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

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

(a) None.

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

(a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pilot scale premix feed tanks, drying beds, and additive make-up tanks	OAC rule 3745-31-05 (A)(3) (PTI 16-02188)	5.0 pounds/hour of OCs; 32.4 pounds/day of OCs; and 2.1 tons/year of OCs
	OAC rule 3745-21-07 (G)(2)	The OC emission limitations required by OAC rule 3745-21-07 (G)(2) are less stringent than the OC emission limitations established pursuant to OAC rule 3745-31-05 (A)(3).

**2. Additional Terms and Conditions**

- (a) As determined from the application, the OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) are based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with process raw materials, production capacity, cleanup materials, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s). All raw/discarded process materials and clean/used cleanup solvents shall be properly identified and held in closed storage vessels or closed containers at all times when not in use or for appropriate off-site disposal.

**B. Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit was evaluated based on the actual process materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 1,3-butadiene (CAS 106-99-0)  
 TLV (ug/m3): 4,400  
 Maximum Hourly Emission Rate (lbs/hr): 5.0  
 Predicted 1-Hour Maximum Ground-Level Concentration at 125 m (ug/m3): 85  
 MAGLC (ug/m3): 105

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:
- changes in the composition of the materials used (process materials and cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).  
If the permittee determines that the "Air Toxics Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics Policy:"
- a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics Policy"; and
  - where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.

**D. Reporting Requirements**

1. None

**E. Testing Requirements**

1. Compliance with the above OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "Premix" by RJ DiMascio (9/14/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

**F. Miscellaneous Requirements**

1. None

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**Facility ID: 1677010196 Emissions Unit ID: P013 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pilot scale polymerization reactors	OAC rule 3745-31-05 (A)(3) (PTI 16-02188)	1.5 pounds/hour of OCs; 13.4 pounds/day of OCs; and 0.6 ton/year of OCs
	OAC rule 3745-21-07 (G)(2)	The OC emission limitations required by OAC rule 3745-21-07 (G)(2) are less stringent than the OC emission limitations established pursuant to OAC rule 3745-31-05 (A)(3).

2. **Additional Terms and Conditions**
  - (a) As determined from the application, the OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) are based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with process raw materials, production capacity, cleanup materials, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).  
All raw/discarded process materials and clean/used cleanup solvents shall be properly identified and held in closed storage vessels or closed containers at all times when not in use or for appropriate off-site disposal.

**B. Operational Restrictions**

1. None

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

1. None

**D. Reporting Requirements**

1. None

**E. Testing Requirements**

1. Compliance with the above OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "Reactors" by RJ DiMascio (9/14/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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**Facility ID: 1677010196 Emissions Unit ID: P014 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
pilot scale polymer finishing	OAC rule 3745-31-05 (A)(3) (PTI 16-02188)	12.9 pounds/hour of OCs; and 2.0 tons/year of OCs
	OAC rule 3745-21-07 (G)	The permittee shall not use any photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), in this emissions unit. Exempt from the requirements of OAC rule 3745-21-07 (G)(2) in accordance with OAC rule 3745-21-07 (G)(9).

**2. Additional Terms and Conditions**

- (a) As determined from the application, the OC emission limitations regulated per OAC rule 3745-31-05 (A) (3) are based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits. However, if any proposed change(s), such as with process raw materials, production capacity, cleanup materials, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).  
All raw/discarded process materials and clean/used cleanup solvents shall be properly identified and held in closed storage vessels or closed containers at all times when not in use or for appropriate off-site disposal.

**B. Operational Restrictions**

1. None

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

1. If the permittee uses in this emissions unit photochemically reactive materials (PRMs), as defined by OAC rule 3745-21-01 (C)(5), the following information shall be recorded:
  - a. the date(s) and identification of the PRMs used in this emissions unit;
  - b. the total OC emissions, in pounds, from the emissions unit for each date PRMs are used, excluding OC emissions from non photochemically reactive cleanup materials;
  - c. the total actual hours of operation for the emissions unit for each date PRMs are used; and
  - d. the average hourly total OC emissions, in pounds/hour, from the emissions unit for each date PRMs are used, excluding OC emissions from non photochemically reactive cleanup materials, i.e., d = b/c.
2. The permit to install for this emissions unit was evaluated based on the actual process materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install

application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-hexane (CAS 110-54-3)  
 TLV (ug/m3): 176,000  
 Maximum Hourly Emission Rate (lbs/hr): 12.9  
 Predicted 1-Hour Maximum Ground-Level Concentration at 83 m (ug/m3): 576.6  
 MAGLC (ug/m3): 4190

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:
    - a. changes in the composition of the materials used (process materials and cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
    - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
    - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).  
 If the permittee determines that the "Air Toxics Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
  4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics Policy:"
    - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
    - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics Policy"; and
    - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports identifying the date(s) PRMs, as defined by OAC rule 3745-21-01 (C)(5), were used in this emissions unit, and the daily and average hourly total OC emissions from the emissions unit, excluding OC emissions from non photochemically reactive cleanup materials, in pounds and pounds/hour, respectively, for each such date.
  2. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
- E. Testing Requirements**
1. Compliance with the above OC emission limitations regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP Finishing" by RJ DiMascio (12/12/01) included in the application.  
  
 Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.
- F. Miscellaneous Requirements**
1. None

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

Facility ID: 1677010196 Emissions Unit ID: T016 Issuance type: Final State Permit To Operate

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#### Part II - Special Terms and Conditions

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

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

- (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1200-gallon capacity, vertical fixed roof storage tank	OAC rule 3745-31-05 (A)(3) (PTI 16-02188)	1.1 tons/year of OCs
	OAC rule 3745-21-07 (D)(2)	The permittee shall install, or have installed, a permanent "submerged fill pipe", as defined by OAC rule 3745-21-01 (C)(6). See section B.1 below.

**2. Additional Terms and Conditions**

- (a) As determined from the application, the OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) is based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with stored contents, physical construction or design of the storage vessel, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

**B. Operational Restrictions**

- 1. No person shall place, store, or hold in any stationary storage vessel of more than five hundred gallons capacity any volatile photochemically reactive material, as defined by OAC rule 3745-21-01(C)(7), unless such vessel is equipped with a permanent submerged fill pipe, is loaded through the use of a portable loading tube which can be inserted below the liquid level line during loading operations, or is a pressure tank as described in paragraph (D)(1) of OAC rule 3745-21-07 or is fitted with a vapor recovery system as described in paragraph (D)(1)(b) of OAC rule 3745-21-07.

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

- 1. The permittee shall keep readily accessible records, for the life of the emissions unit, listing the dimensions, capacity, and chemical description of the stored contents of the storage vessel.

**D. Reporting Requirements**

- 1. None

**E. Testing Requirements**

- 1. Compliance with the above OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP T-4000 System PTE" by RJ DiMascio (9/17/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

**F. Miscellaneous Requirements**

- 1. None

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Facility ID: 1677010196 Emissions Unit ID: T017 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
3600-gallon capacity, vertical fixed roof storage tank	OAC rule 3745-31-05 (A)(3) (PTI 16-02188)	1.1 tons/year of OCs
	OAC rule 3745-21-07 (D)(2)	The permittee shall install, or have installed, a permanent "submerged fill pipe", as defined by OAC rule 3745-21-01 (C)(6). See section B.1 below.

**2. Additional Terms and Conditions**

- (a) As determined from the application, the OC emission limitation regulated per OAC rule 3745-31-05 (A) (3) is based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with stored contents, physical construction or design of the storage vessel, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

**B. Operational Restrictions**

1. No person shall place, store, or hold in any stationary storage vessel of more than five hundred gallons capacity any volatile photochemically reactive material, as defined by OAC rule 3745-21-01(C)(7), unless such vessel is equipped with a permanent submerged fill pipe, is loaded through the use of a portable loading tube which can be inserted below the liquid level line during loading operations, or is a pressure tank as described in paragraph (D)(1) of OAC rule 3745-21-07 or is fitted with a vapor recovery system as described in paragraph (D)(1)(b) of OAC rule 3745-21-07.

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

1. The permittee shall keep readily accessible records, for the life of the emissions unit, listing the dimensions, capacity, and chemical description of the stored contents of the storage vessel.

**D. Reporting Requirements**

1. None

**E. Testing Requirements**

1. Compliance with the above OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP T-4000 System PTE" by RJ DiMascio (9/17/01) included in the application.  
  
Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

**F. Miscellaneous Requirements**

1. None

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Facility ID: 1677010196 Emissions Unit ID: T018 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1000-gallon capacity, vertical fixed roof storage tank	OAC rule 3745-31-05 (A)(3) (PTI 16-02188)  OAC rule 3745-21-07 (D)	0.8 ton/year of OCs  The permittee shall not place, store, or hold any photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), in this emissions unit. The OC emission control requirements of OAC rule 3745-21-07 (D) are less stringent than the OC emission control requirements established pursuant to OAC rule 3745-31-05 (A)(3).
<b>2. Additional Terms and Conditions</b>		
(a) As determined from the application, the OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) is based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with stored contents, physical construction or design of the storage vessel, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).		
<b>B. Operational Restrictions</b>		
1. None		
<b>C. Monitoring and/or Record Keeping Requirements</b>		
1. The permittee shall keep readily accessible records, for the life of the emissions unit, listing the dimensions and capacity of the storage vessel, and whether or not the vessel contents are photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5).		
<b>D. Reporting Requirements</b>		
1. The permittee shall submit deviation (excursion) reports identifying the date(s) photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), were in this emissions unit.		
2. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.		
<b>E. Testing Requirements</b>		
1. Compliance with the above OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP Cement Tanks PTE" by RJ DiMascio (9/20/01) included in the application.  Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.		
<b>F. Miscellaneous Requirements</b>		
1. None		

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Facility ID: 1677010196 Emissions Unit ID: T019 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
5700-gallon capacity, vertical fixed roof	OAC rule 3745-31-05 (A)(3)	0.8 ton/year of OCs

storage tank (PTI 16-02188)

The permittee shall not place, store, or hold any photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), in this emissions unit.

OAC rule 3745-21-07 (D)

The OC emission control requirements of OAC rule 3745-21-07 (D) are less stringent than the OC emission control requirements established pursuant to OAC rule 3745-31-05 (A)(3).

**2. Additional Terms and Conditions**

- (a) As determined from the application, the OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) is based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with stored contents, physical construction or design of the storage vessel, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

**B. Operational Restrictions**

- 1. None

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

- 1. The permittee shall keep readily accessible records, for the life of the emissions unit, listing the dimensions and capacity of the storage vessel, and whether or not the vessel contents are photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5).

**D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports identifying the date(s) photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), were in this emissions unit.
- 2. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

**E. Testing Requirements**

- 1. Compliance with the above OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP Cement Tanks PTE" by RJ DiMascio (9/20/01) included in the application.  
  
Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

**F. Miscellaneous Requirements**

- 1. None

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Facility ID: 1677010196 Emissions Unit ID: T020 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
5700-gallon capacity, vertical fixed roof storage tank	OAC rule 3745-31-05 (A)(3) (PTI 16-02188)	0.8 ton/year of OCs

The permittee shall not place, store, or hold any photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), in this emissions unit.

OAC rule 3745-21-07 (D)

The OC emission control requirements of OAC rule 3745-21-07 (D) are less stringent than the OC emission control requirements established pursuant to OAC rule 3745-31-05 (A)(3).

**2. Additional Terms and Conditions**

- (a) As determined from the application, the OC emission limitation regulated per OAC rule 3745-31-05 (A) (3) is based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with stored contents, physical construction or design of the storage vessel, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

**B. Operational Restrictions**

- 1. None

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

- 1. The permittee shall keep readily accessible records, for the life of the emissions unit, listing the dimensions and capacity of the storage vessel, and whether or not the vessel contents are photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5).

**D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports identifying the date(s) photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), were in this emissions unit.
- 2. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

**E. Testing Requirements**

- 1. Compliance with the above OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP Cement Tanks PTE" by RJ DiMascio (9/20/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

**F. Miscellaneous Requirements**

- 1. None

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Facility ID: 1677010196 Emissions Unit ID: T021 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
5700-gallon capacity, vertical fixed roof storage tank	OAC rule 3745-31-05 (A)(3) (PTI 16-02188)	0.8 ton/year of OCs
	OAC rule 3745-21-07 (D)	The permittee shall not place, store, or hold any photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), in this emissions unit. The OC emission control requirements of OAC rule 3745-21-07 (D) are less stringent than the OC emission control requirements established pursuant to OAC rule 3745-31-05 (A)(3).

**2. Additional Terms and Conditions**

- (a) As determined from the application, the OC emission limitation regulated per OAC rule 3745-31-05 (A) (3) is based upon the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such as with stored contents, physical construction or design of the storage vessel, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

**B. Operational Restrictions**

1. None

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

1. The permittee shall keep readily accessible records, for the life of the emissions unit, listing the dimensions and capacity of the storage vessel, and whether or not the vessel contents are photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5).

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports identifying the date(s) photochemically reactive materials, as defined by OAC rule 3745-21-01 (C)(5), were in this emissions unit.
2. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

**E. Testing Requirements**

1. Compliance with the above OC emission limitation regulated per OAC rule 3745-31-05 (A)(3) shall be based upon potential emission estimates using the mass balance approach and operational assumptions as noted in the document "SPP Cement Tanks PTE" by RJ DiMascio (9/20/01) included in the application.

Should compliance with any emission limitation in this permit ever become suspect, then the permittee may be required to perform emission testing, employing all appropriate USEPA reference methods, to establish precise and representative emission limitations for this emissions unit.

**F. Miscellaneous Requirements**

1. None