

Facility ID: 0125041763 Issuance type: Final State Permit To Operate

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

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

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

Facility ID: 0125041763 Emissions Unit ID: P002 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>
Solids area formation - with 6 granulation units and 12 tablet compression units	OAC rule 3745-31-05(A)(3) (PTI 01-6687)	Organic compound emissions shall not exceed 73.73 lbs/hour, 725.84 lbs/day and 8.94 tons/year. Particulate emissions (PE) shall not exceed 0.19 lb/hr and 0.84 ton/yr. See sections B.1 and B.2 below.
	OAC rule 3745-21-07(G)(9) OAC rule 3745-17-07(A)(1)	The requirements of this rule shall also include compliance with the requirements of OAC rules 3745-21-07(G)(9). See section A.2.a The particulate emissions (PE) limit established by OAC rule 3745-17-07(A)(1) is less stringent than those established under OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(C)	See section A.2.b below. The PE limit established by OAC rule 3745-17-11(C) is less stringent than those established under OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**
 - (a) To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5). There shall be no visible particulate emissions from this emissions unit during production.

B. Operational Restrictions

1. The maximum daily usage rate for this emissions unit shall not exceed 117.3 gallon of ethanol (6.8 lbs OC/gallon).
2. The maximum hourly production rate shall not exceed the following:
 - a. 1110 lbs of solids in granulation; and
 - b. 2302 lbs of solids in tablet compression.

C. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit [P002] was evaluated based on the actual materials and the design parameters of the emissions unit(s) exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such

as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: ethanol

TLV (mg/m3): 1880

Maximum Hourly Emission Rate (lbs/hr): 73.73

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4020

MAGLC (ug/m3): 44,762

The permittee, has demonstrated that emissions of [ethanol], from emissions unit(s) [P002], is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant

emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01],

5. The permittee shall collect and record the following information for each day for the coating operation:

- a. the company identification for each liquid organic material employed;
- b. the number of gallons of liquid organic material employed;
- c. the organic compound content of each liquid organic material, in pounds per gallon;
- d. the total organic compound emission rate for all liquid organic materials, in pounds per day;
- e. the total number of hours the emissions unit was in operation;
- f. the average hourly organic compound emission rate for all liquid organic materials, i.e., (d / e), in pounds per hour (average); and
- g. a monthly record of the OC emission rate based on the summation of the daily emission rate in C.5.d;

[Note: The liquid organic materials, as employed, shall not exceed 6.8 lbs OC/gallon.]

[OAC rule 3745-31-05(A)(3)]

6. The permittee shall maintain daily records of the solids usage in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. an identification of each day during which the average hourly total organic compound emissions exceeded 73.73 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
- b. an identification of each day during which the total organic compound emissions exceeded 725.84 pounds per day, and the actual organic compound emissions for each such day.

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

[OAC rule 3745-31-05(A)(3)]

3. The permittee shall also submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

4. The permittee shall notify the Director (Central District Office) in writing of any record which identifies each day during which any photochemically reactive materials were employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (Central District Office) within 30 days after the event occurs.

5. The permittee shall submit annual reports that identify any exceedances of the hourly production rate limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation
Organic compound emissions shall not exceed 73.73 lbs/hour:

Applicable Compliance Method
Compliance shall be demonstrated by recordkeeping in section C.5 above.
Emission Limitation:
Organic compound emissions shall not exceed 725.84 lbs/day.

Applicable Compliance Method:
Compliance shall be demonstrated by recordkeeping in section C.5 above.

Emission Limitation

Organic compound emissions shall not exceed 8.94 tons/yr.

Applicable Compliance Method

Compliance shall be demonstrated by recordkeeping in section C.5 above.

Emission Limitation:

Particulate emissions shall not exceed 0.19 lb/hr and 0.84 ton/yr.

Applicable Compliance Method:

Compliance shall be demonstrated by recordkeeping in section C.6 above.

F. **Miscellaneous Requirements**

1. None

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Facility ID: 0125041763 Emissions Unit ID: P010 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>
Fluid bed dryer/granulator	OAC rule 3745-31-05(A)(3) (PTI 01-6687)	Organic compound emissions shall not exceed 66 lbs/hour, 793.4 lbs/day and 7.92 tons/year. See section B.1 below. The requirements of this rule shall also include compliance with the requirements of OAC rules 3745-21-07(G)(9).
	OAC rule 3745-21-07(G)(9)	See section A.2.a

2. **Additional Terms and Conditions**

- (a) To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. **Operational Restrictions**

1. The maximum daily usage rate for this emissions unit shall not exceed 117 gallon of ethanol (6.8 lbs OC/gallon).

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

1. The permit to install for this emissions unit [P010] was evaluated based on the actual materials and the design parameters of the emissions unit's(s) exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: ethanol

TLV (mg/m³): 1880

Maximum Hourly Emission Rate (lbs/hr): 66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 4020

MAGLC (ug/m³): 44,762

The permittee, has demonstrated that emissions of [ethanol], from emissions unit(s) [P010], is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model,

used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01],

5. The permittee shall collect and record the following information for each day for the coating operation:
- the company identification for each liquid organic material employed;
 - the number of gallons of liquid organic material employed;
 - the organic compound content of each liquid organic material, in pounds per gallon;
 - the total organic compound emission rate for all liquid organic materials, in pounds per day;
 - the total number of hours the emissions unit was in operation;
 - the average hourly organic compound emission rate for all liquid organic materials, i.e., (d / e), in pounds per hour (average); and
 - a monthly record of the OC emission rate based on the summation of the daily emission rate in C.5.d;

[Note: The liquid organic materials, as employed, shall not exceed 6.8 lbs OC/gallon.]

[OAC rule 3745-31-05(A)(3)]

D. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
- an identification of each day during which the average hourly total organic compound emissions exceeded 66 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - an identification of each day during which the total organic compound emissions exceeded 793.4 pounds per day, and the actual organic compound emissions for each such day.

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

[OAC rule 3745-31-05(A)(3)]

3. The permittee shall also submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall notify the Director (Central District Office) in writing of any record which identifies each day during which any photochemically reactive materials were employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (Central District Office) within 30 days after the event occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
- Emission Limitation
Organic compound emissions shall not exceed 66 lbs/hour:

Applicable Compliance Method
Compliance shall be demonstrated by recordkeeping in section C.5 above.
Emission Limitation:
Organic compound emissions shall not exceed 793.4 lbs/day.

Applicable Compliance Method:
Compliance shall be demonstrated by recordkeeping in section C.5 above.
Emission Limitation
Organic compound emissions shall not exceed 7.92 tons/yr.

Applicable Compliance Method
Compliance shall be demonstrated by recordkeeping in section C.5 above.

F. Miscellaneous Requirements

1. None