



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

10/7/2008

Certified Mail

GLENN SCHNEIDER
POLYONE CORP
POLY ONE CENTER
PO BOX 122
AVON LAKE, OH 44012

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0247030884
Permit Number: P0103844
Permit Type: Initial Installation
County: Lorain

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc>.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA DAPC, Northeast District Office

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install
for
POLYONE CORP**

Facility ID: 0247030884
Permit Number: P0103844
Permit Type: Initial Installation
Issued: 10/7/2008
Effective: 10/7/2008



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
POLYONE CORP

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0103844
Facility ID: 0247030884
Effective Date: 10/7/2008

Authorization

Facility ID: 0247030884
Facility Description: PVC Compounding
Application Number(s): A0035909
Permit Number: P0103844
Permit Description: X and Y extruder lines (P038 and P039)
Permit Type: Initial Installation
Permit Fee: \$400.00
Issue Date: 10/7/2008
Effective Date: 10/7/2008

This document constitutes issuance to:

POLYONE CORP
MOORE & WALKER RD
AVON LAKE, OH 44012

Of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0103844
Facility ID: 0247030884
Effective Date: 10/7/2008

Authorization (continued)

Permit Number: P0103844
 Permit Description: X and Y extruder lines (P038 and P039)

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

Emissions Unit ID:	P038
Company Equipment ID:	4.5" SSE X Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P039
Company Equipment ID:	4.5" SSE Y Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0103844
Facility ID: 0247030884
Effective Date: 10/7/2008

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 2.a), Severability Clause
 - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A. 9., Reporting Requirements
 - (5) Standard Term and Condition A. 10., Applicability
 - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A. 14., Public Disclosure
 - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A. 16., Fees
 - (10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted



(i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum,



the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.



16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0103844
Facility ID: 0247030884
Effective Date: 10/7/2008

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0103844
Facility ID: 0247030884
Effective Date: 10/7/2008

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0103844
Facility ID: 0247030884
Effective Date: 10/7/2008

C. Emissions Unit Terms and Conditions



1. **P038, 4.5" SSE X Line**

Operations, Property and/or Equipment Description:

Extruder line X including a weigh feeder, liquid mixer, day tank, extruder, cooler, pelletizer, pellet vacuum lifting station, Gala dryer, and screener

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

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

a. 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.

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See Sections C.1.b)(2)a., C.1.b)(2)b., and C.1.b)(2)c. Visible particulate emissions from the stack shall not exceed 0% opacity, as a 6-minute average. Visible particulate emissions of fugitive dust shall not exceed 0% opacity, as a 3-minute average. See Section C.1.b)(2)g.
b.	OAC rule 3745-17-07(A)(1)	See Section C.1.b)(2)d.
	OAC rule 3745-17-11(B)	See Section C.1.b)(2)e.
	OAC rule 3745-17-07(B)(1)	See Section C.1.b)(2)f.
	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See Section C.1.b)(2)h.



- (2) Additional Terms and Conditions
 - a. Stack particulate emissions associated with this emissions unit shall not exceed 0.01 lb/hr and 0.05 tpy.
 - b. Fugitive particulate emissions from this emissions unit shall not exceed 0.32 tpy.
 - c. Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.25 lb/hr and 1.08 tpy.
 - d. The requirements established pursuant to OAC rule 3745-17-07(A)(1) are less stringent than the requirements established in accordance with OAC rule 3745-31-05(A)(3).
 - e. The requirements established pursuant to OAC rule 3745-17-11(B) are less stringent than the requirements established in accordance with OAC rule 3745-31-05(A)(3).
 - f. The requirements established pursuant to OAC rule 3745-17-07(B)(1) are less stringent than the requirements established in accordance with OAC rule 3745-31-05(A)(3).
 - g. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to; doorways, windows, and roof monitors.
 - h. For the extruder, classifier, pellet lift, and all of the raw material feeders, the permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measure (RACM). These measures shall include, but not be limited to, the following:
 - i. Installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
 - ii. Maintain a collection efficiency that is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- c) Operational Restrictions
 - (1) The permittee shall operate the baghouse associated with this emissions unit when the emissions unit is in operation.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain records of all periods of time when the emissions unit is in operation and the associated baghouse is not in operation.
 - (2) The permittee shall perform daily checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be



noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. The color of the emission;
- b. The total duration of any visible emission incident; and
- c. Any corrective actions taken to eliminate the visible emissions.

Notwithstanding the frequency of reporting requirements specified above, the permittee may reduce the frequency of visual observation from daily to weekly for this emissions unit if the following conditions are met:

- d. For 1 full quarter if the facility's visual observations indicate no visible emission; and
- e. The permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from the area immediately above the capture system serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. The color of the emissions;
- b. The total duration of any visible emission incident; and
- c. Any corrective actions taken to eliminate the visible emissions.

Notwithstanding the frequency of reporting requirements specified above, the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:

- d. For 1 full quarter the facility's visual observations indicate no visible emissions; and
- e. The permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.



- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the area immediately above the capture system serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (3) The permittee shall submit deviation (excursion) reports that identify all periods of time during which the emissions unit was in operation and the associated baghouse was not in operation.

f) Testing Requirements

- (1) Compliance with the emissions limitations in Section C.1. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Stack particulate emissions associated with this emissions unit shall not exceed 0.01 lb/hr and 0.05 tpy.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the following equation:

$$PE \text{ total (lb/hr)} = [(baghouse \text{ control outlet, gr/dscf}) \times (baghouse \text{ exhaust gas flow rate, acfm}) \times (460 + 70 \text{ F, standard temperature} / 460 + baghouse \text{ stack gas temperature F}) \times (60 \text{ min/hr}) \times (1 \text{ lb} / 7000 \text{ gr})]$$

Where:

PE total (lb/hr) = total mass emissions rate, in lb/hr of particulate emissions

Baghouse control outlet = 0.002 gr/dscf

Baghouse exhaust flow rate = 640 acfm

Baghouse stack gas temperature = 70 F

If required pursuant to OAC rule 3475-15-04, the permittee shall demonstrate compliance with the hourly particulate emissions limit of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 5, and in OAC rule 3745-17-03(B)(10).

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly emission limitation by the maximum annual operation schedule of 8760 hours/year and then dividing by 2000 lbs/ton).



b. Emission Limitation:

Fugitive particulate emissions from this emissions unit shall not exceed 0.32 tpy.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by the following equation:

$$PE \text{ fugitive (tpy)} = [PE \#1 \text{ fugitive (lb/hr)} + PE \#2 \text{ fugitive (lb/hr)}] \times (8760 \text{ hrs/yr}) \times (1 \text{ ton}/2000 \text{ lbs})$$

Where:

PE #1 fugitive (lb/hr) = total fugitive particulate emissions from main section of extruder

PE #2 fugitive (lb/hr) = total fugitive particulate emissions from pellet lift

For fugitive points:

PE #1 fugitive (lb/hr) = (emission factor) × (max. hourly throughput) × (losses not collected in baghouse) × (losses not collected in building)

PE #2 fugitive (lb/hr) = (grain loading at pellet lift) × (air flow rate) × (60 min/hr) × (losses not collected in building) × (460 + 70 F, standard temperature / 460 + stack gas temperature F) × (1 lb / 7000 gr)

Where:

PE emission factor = 20 lbs/ton (assumes 1% total throughput available for emission)

Maximum throughput = 0.70 ton/hr

Grain loading at pellet lift = 0.02 gr/dscf

Pellet lift exhaust flow rate = 450 acfm

Pellet lift exhaust gas temperature = 70 F

Hours of operation per year = 8760

Capture efficiency of baghouse = 99.5%

Capture efficiency of building = 50%

Losses not collected in baghouse = (1 – 99.5/100)

Losses not collected in building = (1-50/100)



c. Emission Limitation:

Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.25 lb/hr and 1.08 tpy.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the following equation:

$$\text{VOC (lb/hr)} = (\text{hourly throughput, tph}) \times (\text{VOC emission factor})$$

Where:

Hourly throughput = 0.70 ton/hr

VOC emission factor = 0.354 lb/ton, obtained from stack testing conducted on this line in August 1996 at the Valleyfield facility

If required pursuant to OAC rule 3745-15-04, the permittee shall demonstrate compliance with the hourly VOC limit in this permit by means of physical testing of the effluent from this emission unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18, 25, or 25A, as appropriate.

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by the maximum annual operating schedule of 8760 hours/year and then dividing by 2000 lbs/ton).

d. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

e. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 0% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0103844
Facility ID: 0247030884
Effective Date: 10/7/2008

Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- g) Miscellaneous Requirements
 - (1) None.



2. **P039, 4.5" SSE Y Line**

Operations, Property and/or Equipment Description:

Extruder line Y including a weigh feeder, liquid mixer, day tank, extruder, cooler, pelletizer, pellet vacuum lifting station, Gala dryer, and screener

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

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

a. 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.

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See Sections C.2.b)(2)a., C.2.b)(2)b., and C.2.b)(2)c. Visible particulate emissions from the stack shall not exceed 0% opacity, as a 6-minute average. Visible particulate emissions of fugitive dust shall not exceed 0% opacity, as a 3-minute average. See Section C.2.b)(2)g.
b.	OAC rule 3745-17-07(A)(1)	See Section C.2.b)(2)d.
	OAC rule 3745-17-11(B)	See Section C.2.b)(2)e.
	OAC rule 3745-17-07(B)(1)	See Section C.2.b)(2)f.
	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See Section C.2.b)(2)h.



(2) Additional Terms and Conditions

- a. Stack particulate emissions associated with this emissions unit shall not exceed 0.01 lb/hr and 0.05 tpy.
- b. Fugitive particulate emissions from this emissions unit shall not exceed 0.26 tpy.
- c. Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.14 lb/hr and 0.62 tpy.
- d. The requirements established pursuant to OAC rule 3745-17-07(A)(1) are less stringent than the requirements established in accordance with OAC rule 3745-31-05(A)(3).
- e. The requirements established pursuant to OAC rule 3745-17-11(B) are less stringent than the requirements established in accordance with OAC rule 3745-31-05(A)(3).
- f. The requirements established pursuant to OAC rule 3745-17-07(B)(1) are less stringent than the requirements established in accordance with OAC rule 3745-31-05(A)(3).
- g. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to; doorways, windows, and roof monitors.
- h. For the extruder, classifier, pellet lift, and all of the raw material feeders, the permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measure (RACM). These measures shall include, but not be limited to, the following:
 - i. Installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
 - ii. Maintain a collection efficiency that is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

c) Operational Restrictions

- (1) The permittee shall operate the baghouse associated with this emissions unit when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of all periods of time when the emissions unit is in operation and the associated baghouse is not in operation.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be



noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. The color of the emission;
- b. The total duration of any visible emission incident; and
- c. Any corrective actions taken to eliminate the visible emissions.

Notwithstanding the frequency of reporting requirements specified above, the permittee may reduce the frequency of visual observation from daily to weekly for this emissions unit if the following conditions are met:

- d. For 1 full quarter if the facility's visual observations indicate no visible emission; and
- e. The permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from the area immediately above the capture system serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. The color of the emissions;
- b. The total duration of any visible emission incident; and
- c. Any corrective actions taken to eliminate the visible emissions.

Notwithstanding the frequency of reporting requirements specified above, the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:

- d. For 1 full quarter the facility's visual observations indicate no visible emissions; and
- e. The permittee continues to comply with all the record keeping and monitoring requirements specified above.

- (4) The permittee shall revert to daily readings if any visible emissions are observed.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.



- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the area immediately above the capture system serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- (3) The permittee shall submit deviation (excursion) reports that identify all periods of time during which the emissions unit was in operation and the associated baghouse was not in operation.

f) Testing Requirements

- (1) Compliance with the emissions limitations in Section C.2. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Stack particulate emissions associated with this emissions unit shall not exceed 0.01 lb/hr and 0.05 tpy.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the following equation:

$$PE \text{ total (lb/hr)} = [(baghouse \text{ control outlet, gr/dscf}) \times (baghouse \text{ exhaust gas flow rate, acfm}) \times (460 + 70 \text{ F, standard temperature} / 460 + baghouse \text{ stack gas temperature F}) \times (60 \text{ min/hr}) \times (1 \text{ lb} / 7000 \text{ gr})]$$

Where:

PE total (lb/hr) = total mass emissions rate, in lb/hr of particulate emissions

Baghouse control outlet = 0.002 gr/dscf

Baghouse exhaust flow rate = 640 acfm

Baghouse stack gas temperature = 70 F

If required pursuant to OAC rule 3475-15-04, the permittee shall demonstrate compliance with the hourly particulate emissions limit of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 5, and in OAC rule 3745-17-03(B)(10).

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly emission limitation by the maximum annual operation schedule of 8760 hours/year and then dividing by 2000 lbs/ton).



b. Emission Limitation:

Fugitive particulate emissions from this emissions unit shall not exceed 0.26 tpy.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by the following equation:

$$PE \text{ fugitive (tpy)} = [PE \#1 \text{ fugitive (lb/hr)} + PE \#2 \text{ fugitive (lb/hr)}] \times (8760 \text{ hrs/yr}) \times (1 \text{ ton}/2000 \text{ lbs})$$

Where:

PE #1 fugitive (lb/hr) = total fugitive particulate emissions from main section of extruder

PE #2 fugitive (lb/hr) = total fugitive particulate emissions from pellet lift

For fugitive points:

PE #1 fugitive (lb/hr) = (emission factor) × (max. hourly throughput) × (losses not collected in baghouse) × (losses not collected in building)

PE #2 fugitive (lb/hr) = (grain loading at pellet lift) × (air flow rate) × (60 min/hr) × (losses not collected in building) × (460 + 70 F, standard temperature / 460 + stack gas temperature F) × (1 lb/7000 gr)

Where:

PE emission factor = 20 lbs/ton (assumes 1% total throughput available for emission)

Maximum throughput = 0.40 ton/hr

Grain loading at pellet lift = 0.02 gr/dscf

Pellet lift exhaust flow rate = 450 acfm

Pellet lift exhaust gas temperature = 70 F

Hours of operation per year = 8760

Capture efficiency of baghouse = 99.5%

Capture efficiency of building = 50%

Losses not collected in baghouse = (1 – 99.5/100)

Losses not collected in building = (1-50/100)



c. Emission Limitation:

Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.14 lb/hr and 0.62 tpy.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by the following equation:

$$\text{VOC (lb/hr)} = (\text{hourly throughput, tph}) \times (\text{VOC emission factor})$$

Where:

Hourly throughput = 0.40 ton/hr

VOC emission factor = 0.354 lb/ton, obtained from stack testing conducted on this line in August 1996 at the Valleyfield facility

If required pursuant to OAC rule 3745-15-04, the permittee shall demonstrate compliance with the hourly VOC limit in this permit by means of physical testing of the effluent from this emission unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18, 25, or 25A, as appropriate.

As long as compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation will be shown (the annual emission limitation was calculated by multiplying the hourly limitation by the maximum annual operating schedule of 8760 hours/year and then dividing by 2000 lbs/ton).

d. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 0% opacity, as a 6-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

e. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 0% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such



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Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- g) Miscellaneous Requirements
 - (1) None.