State of Ohio Environmental Protection Agency

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

Certified Mail

10/9/2008

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

MICHAEL DESGRANGES
CAPITAL RESIN CORP
324 DERING AVE
COLUMBUS, OH 43207

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125040238
Permit Number: P0082687
Permit Type: Renewal
County: Franklin

Dear Permit Holder:

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

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO 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

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-CDO

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install and Operate
for
CAPITAL RESIN CORP

Facility ID: 0125040238
Permit Number: P0082687
Permit Type: Renewal
Issued: 10/9/2008
Effective: 10/9/2008
Expiration: 10/9/2013

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
CAPITAL RESIN CORP

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Authorization

Facility ID: 0125040238
Application Number(s): A0013016
Permit Number: P0082687
Permit Description: Resin Reactor R-3 with condenser
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 10/9/2008
Effective Date: 10/9/2008
Expiration Date: 10/9/2013
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15
This document constitutes issuance to:

CAPITAL RESIN CORP
324 DERING AVENUE
COLUMBUS, OH 43207

of a Permit-to-Install and Operate 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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0082687
Permit Description: Resin Reactor R-3 with condenser

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID:	**P014**
Company Equipment ID:	R-3
Superseded Permit Number:	01-12225
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. **What does this permit-to-install and operate ("PTIO") allow me to do?**

   This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. **Who is responsible for complying with this permit?**

   The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

   The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. **What records must I keep under this permit?**

   You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. **What are my permit fees and when do I pay them?**

   There are two fees associated with permitted air contaminant sources in Ohio:

   - PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

     You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

   - Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. **When does my PTIO expire, and when do I need to submit my renewal application?**

   This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

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.

C. Emissions Unit Terms and Conditions

1. P014, R-3

Operations, Property and/or Equipment Description:

Reactor 3 (R-3000) 3,000 gallon with condenser

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)(a)(ii) (voluntary restriction to avoid BAT)	See (2)a and c)1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and 3745-15-06.
b.	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent that the maximum potential to emit for this emissions unit. See (2)b below.
c.	OAC rule 3745-15-06	See (2)c below.
d.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V and MACT requirements)	See (2)d below.

(2) Additional Terms and Conditions

a. "Permit to Install 01-12225 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. all of the OC emissions from this emissions unit shall be vented to the condenser when the emissions unit is in operation; and

ii. the emissions of OC from this emissions unit shall not exceed 1.0 ton per year.

b. The requirements established under OAC rule 3745-21-07 shall cease to be effective and federally enforceable on the date the U.S. EPA approves the current rule as a revision to the Ohio SIP for the control of organic compounds.

c. The permittee shall, prior to production, ensure that this emissions unit is connected to the Emergency Containment System and that the Emergency Containment System is functional.

If any event causes a rupture disc to open, releasing material to the Emergency Containment System, all resin production shall be stabilized and no new batches will be started or restarted until any necessary repairs are made. The emergency containment system shall be drained and prepared for normal kettle operation prior to production restart.

d. The restrictions on the potential to emit for facility-wide individual hazardous air pollutants (HAP), total combined HAP and organic compounds (OC) established under OAC rule 3745-31-05(D) are as follows for the emissions units listed in section d)(3) below:

i. the facility-wide individual HAP and total HAP emissions shall not exceed 9.9 tons and 24.9 tons as a rolling, 12-month summation, respectively, and

ii. the facility-wide total OC emissions shall not exceed 99.9 tons as a rolling, 12-month summation.

Facility-wide emissions shall be determined from a summation of monthly emissions from the following emission units: P004, P005, P006, P007, P008, P010, P012, P013, P014, P016, P027, P018, P019, P020, P021, P023, P024, P025, P026 and all emissions units that are exempt or permit by rule (OAC rule 3745-31-03), and de minimis (OAC rule 3745-15-05).

Therefore, the provisions for Title V permitting and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing in 40 CFR Part 63 Subpart FFFF will not be applicable.

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

c) Operational Restrictions

(1) In order to maintain compliance with the applicable emission limitation contained in this permit, the acceptable maximum average temperature of the exhaust gases from the condenser, as a 15-minute average, shall not be more than 77 degrees Fahrenheit. The condenser shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the emission control 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, with any modifications deemed necessary by the permittee. The permittee shall collect the temperature of the exhaust gases from the condenser, during each day of operation, and shall record and maintain the following information each day:

a. all time, when the emissions unit was in operation, during which the maximum average temperature, as a 15-minute average, of the exhaust gases from the condenser exceeded 77 degrees Fahrenheit; and

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

These records shall be maintained at the facility for a period of three years.

(2) Whenever the monitored temperature of the exhaust gases deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was deviation;

j. the exhaust gas temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work. Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

l. The exhaust gas temperature limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Central District Office. The permittee may request revisions to the permitted exhaust gas temperature limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the exhaust gas temperature limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(3) At the end of each calendar month, the permittee shall calculate and record the following information for each day of the preceding month:

a. the number of batches processed in this emissions unit;

b. an identification of OC and individual HAP emissions for each batch;

c. the summation of actual OC and individual HAP emissions for each month of operation, from all batches produced each month; and

d. the summation of actual OC and individual HAP emissions from this emissions unit during the rolling, 12-month period of operation calculated by summing the emissions from each month of operation to the previous 11-month summations.

(4) The permittee shall maintain the following monthly records on-site to document compliance with the facility-wide restriction on the potential to emit for OC, individual HAP, and total HAP. The records shall include a minimum of the following information for emissions units P004, P005, P006, P007, P008, P010, P012, P013, P014, P016, P027, P018, P019, P020, P021, P023, P024, P025, P026, and any permit exempt and deminimus emissions unit :

a. the calculated facility-wide OC emissions for the current month, in pounds or tons, for each the above emissions units;

b. the rolling, 12-month summation of facility-wide OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months) for all the above emissions units;

c. the calculated facility-wide individual HAP emissions for the current month, in pounds or tons, for each the above emissions units;

d. the calculated facility-wide total HAP emissions for the current month, in pounds or tons, for each the above emissions units;

e. the rolling 12-month summation of individual HAP emissions (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months) for all the above emissions units;

f. the rolling 12-month summation of total facility-wide HAP emissions (i.e., the to a; facility-wide HAP emissions from the current month added to the summation of the total facility-wide HAP emissions from the previous 11 months) for all the above emissions units; and

g. the rolling 12-month summation of facility-wide OC, individual HAP, total HAP emissions from permanent exempt and de minimis emissions units.

e) Reporting Requirements

(1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the condenser during the operation of the emissions unit:

a. each period of time when the average temperature of the exhaust gases, as a 15-minute average, from the condenser was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

b. an identification of each incident of deviation described in Aa@ (above) where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in Aa@ where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken;

d. an identification of each incident of deviation described in Aa@ where proper records were not maintained for the investigation and/or the corrective action(s), and

e. any records of downtime (date and length of time) for the capture (collection) system, the condenser, and/or the monitoring equipment when the emissions unit was/were in operation;.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)]

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall

cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]

(3) The permittee shall submit quarterly deviation (excursion) reports for deviations (excursions) associated with exceedences of the following facility-wide emission limitations and operational restrictions:

a. the rolling 12-month individual HAP and total HAP emission limitations listed in term (2)d.i; and

b. the rolling, 12-month OC emission limitation listed in term (2)d.ii.

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

f) Testing Requirements

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

a. Emission Limitation:

The OC emissions from this emissions unit shall not exceed 1.0 ton per year.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the record keeping requirements in section d)(3)c of this permit. The annual OC emission was derived at the maximum potential to emit using an emission factor of 1.3 lbs OC/batch derived during phenol-formaldehyde resin production multiplied by 4 batches per day by 31 days per month by 365 day per year and divided by 2,000 lbs/ton.

b. Emission Limitation:

The facility-wide emissions of individual HAP and total HAP shall not exceed 9.9 tons and 24.9 tons as a rolling, 12-month summation, respectively.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section d)(4)g of this permit for all the emission units at the facility.

c. Emission Limitation:

The total facility-wide OC emissions shall not exceed 99.9 tons per rolling, 12-month period from all emissions units listed in above .

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section d)(4)g of this permit above for all the emission units at the facility.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with the Ohio EPA=s AAir Toxic Policy@ was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists= (ACGIH=s) handbook entitled ATLVs and BEIs@ (AThreshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices@).