State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

10/14/2008

Certified Mail
Facility ID: 1677010029
Permit Number: P0102593
County: Summit

William Ramus
Emerald Performance Materials, LLC
240 West Emerling Avenue
Akron, OH 44301-1600

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 5/6/2008. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
Columbus, Ohio 43215

and

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Akron Regional Air Quality Management District

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

PRELIMINARY PROPOSED

Air Pollution Title V Permit
for
Emerald Performance Materials, LLC

Facility ID: 1677010029
Permit Number: P0102593
Permit Type: Renewal
Issued: 10/14/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Title V Permit
for
Emerald Performance Materials, LLC

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Authorization

Facility ID: 1677010029
Facility Description: Industrial Organic Chemicals
Application Number(s): A0034439, A0034440, A0034441, A0034442, A0034443, A0034444, A0034445, A0034446, A0034447
Permit Number: P0102593
Permit Description: Title V Renewal and Minor Permit Modification.
Permit Type: Renewal
Issue Date: 10/14/2008
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Emerald Performance Materials, LLC
240 West Emerling Avenue
Akron, OH 44301-1600

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

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Akron Regional Air Quality Management District. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Akron Regional Air Quality Management District.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.
(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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.
(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee

shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.
(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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.

b) 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 paragraph (E) of OAC rule 3745-77-03.

(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.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the

Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as

soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports

pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.
(Authority for term: OAC rule 3745-77-07(C))

27. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.
(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) 6.

2. This facility is subject to 40 CFR Part 68 (112(r) of the Clean Air Act).

3. The following insignificant emissions units are located at this facility:

   T020 - aniline #3,
   T022 - isobutylene #11,
   T031 - Vanlube #17 - NEPA,
   T032 - Vanlube #18 - Stalite,
   T033 - propylene trimer #13,
   T034 - Vanlube #19 - NEPA,
   T036 - Stalite #21,
   T037 - Superlite #52,
   T039 - Vanlube #55 - DEPA,
   T040 - Vanlube #56 - 3190 NT,
   T045 - BN #64 - butadiene,
   T046 - BN #65 - butadiene,
   T047 - recovered butadiene #66,
   T048 - butadiene #67,
   T071 - TK4 recovered aniline - 26, 844 gallon horizontal cylindrical storage tank (PTI 16-1200),
   T077 - TK9 - 13,450 gallon triisobutylene storage tank (PTI 16-1271),
   T079 - TK8 - 16,150 gallon styrene storage tank (PTI 16-1271),
   T082 - TK16 - 28,975 gallon DPA storage tank (PTI 16-1365),
   T083 - TK12 - 13,750 gallon propylene trimer storage tank (PTI 16-1365),
   T084 - TK15 - 28,975 gallon diisobutylene storage tank (PTI 16-1365),
   T085 - 3190 NT - TK25 (PTI 16-1979),
   B010 - 115 Kilowatt Detroit Model 53L-67 Electric Generator,
   B011 - 50 Kilowatt International Model 50KA9R8/302F Electric Generator,
   B012 - 170 Horsepower Detroit Model PTA-1SD-50 Firefighting Water Pump, and
   B013 - 325 Horsepower Cummins Model NT855-F2 Firefighting Water Pump.

   Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally - approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

   [Authority for term: OAC rule 3745-77-07(A)(13)]

4. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart U: P007, P020, T041, T042, T043, and T044. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website: http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District or local air agency.

5. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart FFFF: P003, P006, P016, T020, T031, T032, T034, T036, T037, T039, T040, T079 and T082. The complete

MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website: http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District or local air agency.

6. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

B003 - 1.7 MM Btu/hr natural gas-fired ARD Dowtherm Boiler,
B004 - 1.7 MM Btu/hr natural gas-fired DPPD Dowtherm Boiler,
B009 - 2.2 MM Btu/hr natural gas-fired DPA A/O Dowtherm Boiler,
F001 - Plant Roadways & Parking Areas,
F002 - Coal Storage Piles,
F003 - Material Handling,
G001 - Gasoline Dispensing,
G002 - Diesel Dispensing,
P002 - Solid Superlite Process,
P022 - Lab Vents,
P023 - ETBN Blend Tank,
P024 - RLP Dimer Collection System - Process Vessels,
T051 - Sulfuric Acid #57,
T052 - Dresinate 731 - #71,
T053 - Dresinate 214 - #72,
T054 - Methacrylic Acid - #73,
T059 - ADVA - #102,
T063 - Tk#58 - Sulfuric Acid,
T064 - Hydrogen Peroxide,
T065 - Safety B/305 - C13 - Diesel,
T068 - Boilerhouse Gasoline - T124,
T072 - Chemical Storage and Mixing Tanks,
T073 - TK5 - 32% Hydrochloric acid - 11, 147 gallon vertical cylinderical storage tank,
T074 - TK6 - 32% Hydrochloric acid - 11, 147 gallon vertical cylinderical storage tank,
T075 - TK7 - 50% Caustic soda - 23, 300 gallon vertical cylindrical storage tank,
Z001 - Safety B/333 - T127, and
Z002 - TK-69 - 5,000 gallon latex KOH tank.

C. Emissions Unit Terms and Conditions

1. B001, Gas Boiler #1

Operations, Property and/or Equipment Description:

93 mmBTU/hr. natural gas boiler #1

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-10(B)(1)	The maximum allowable amount of particulate emissions for any new or existing fuel burning equipment which is fired only with gaseous fuels, excluding blast furnace gas, and/or number two fuel oil shall be 0.020 pound per million Btu of actual heat input.
c.	40 CFR 63.52(a)(2)	See b)(2)a. below.

(2) Additional Terms and Conditions

a. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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 minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

The maximum allowable amount of particulate emissions for any new or existing fuel burning equipment which is fired only with gaseous fuels, excluding blast

furnace gas, and/or number two fuel oil shall be 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be demonstrated using the particulate emission factor of 1.9 pounds of particulate emissions per million standard cubic feet (scf) of natural gas fired divided by 1020 Btu/scf (AP-42, dated 7/98, Table 1.4-2).

If required, compliance with the allowable emission limitation above shall be demonstrated using Methods 1-5 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-17-03(B)(9) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. B002, Gas Boiler #2

Operations, Property and/or Equipment Description:

64 mmBTU/hr. natural gas boiler #2

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-10(B)(1)	The maximum allowable amount of particulate emissions for any new or existing fuel burning equipment which is fired only with gaseous fuels, excluding blast furnace gas, and/or number two fuel oil shall be 0.020 pound per million Btu of actual heat input.
c.	40 CFR 63.52(a)(2)	See b)(2)a. below.

(2) Additional Terms and Conditions

a. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations in b(1) above shall be determined in accordance with the following methods:

a. Emission Limitation:

The maximum allowable amount of particulate emissions for any new or existing fuel burning equipment which is fired only with gaseous fuels, excluding blast furnace gas, and/or number two fuel oil shall be 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be demonstrated using the particulate emission factor of 1.9 pounds of particulate emissions per million standard cubic feet (scf) of natural gas fired divided by 1020 Btu/scf (AP-42, dated 7/98, Table 1.4-2).

If required, compliance with the allowable emission limitation above shall be demonstrated using Methods 1-5 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-17-03(B)(9) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60,

Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

3. B008, Coal Fired Boiler

Operations, Property and/or Equipment Description:

115 mmBTU/hr. coal fired boiler

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-10(C)	The particulate emissions shall not exceed 0.19 pound of particulate emissions per million Btu actual heat input.
c.	OAC rule 3745-18-83(H)	The permittee shall not cause or permit the emission of sulfur dioxide from any stack at this facility in excess of 5.22 pounds of sulfur dioxide per million Btu actual heat input.
d.	40 CFR 52.1881(b)(10)(xx)	The sulfur dioxide emission limitation required by 40 CFR 52.1881(b)(10)(xx) is equivalent to the sulfur dioxide emission limitation specified in OAC rule 3745-18-83(H).
e.	40 CFR Part 64	See d)(3) through d)(6), e)(2), e)(3), and e)(5) through e)(7) below.
f.	40 CFR 63.52(a)(2)	See b)(2)a. below.

(2) Additional Terms and Conditions

a. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

c) Operational Restrictions

(1) The quality of the coal burned in this emissions unit shall meet the following specifications on an "as received" wet basis:

a. less than 14 percent ash by weight;

b. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 5.22 pounds sulfur dioxide per million Btu actual heat input; and

c. greater than 10,500 Btu/pound of coal.

Compliance with the above-mentioned specifications shall be determined by using weighted, arithmetic average of the analytical results provided by the permittee or coal supplier for all shipments of coal during each calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, Standard Test Method for Ash in the Analysis Sample of Coal and Coke from Coal; ASTM method D3177, Standard Test Methods for Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Standard Test Methods for Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Standard Test Method for Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

[Authority of term: OAC 3745-18-04(D) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, and heat content.

[Authority for term: OAC rule 3745-18-04(I) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and 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 specified below, 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: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1.0 to 9.0 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

(4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(4)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.3]

(5) The permittee shall perform an inspection of the baghouse on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations and shall include a physical inspection of the unit to check for bag deterioration, dry rot, loose or torn bags, fallen bags, etc. Representative bag samples from each compartment of the baghouse shall be taken and testing on the samples shall be performed to determine bag condition and remaining bag life as described in f)(2) below. The baghouse duct work shall be inspected for holes, rust, etc and the baghouse dampers shall be visual inspected. Repair and replacement of equipment shall be performed as determined by the inspection. The permittee shall also perform daily inspections of the pressure taps on the differential pressure gauge to check for plugging in accordance with the inspection and maintenance checklist.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

(6) The permittee shall maintain a record of the results of each annual and daily inspection of the baghouse, as well as the results of the bag testing required in f)(2) below.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7(c), and 40 CFR Part 64.9(b)]

e) Reporting Requirements

(1) The permittee shall submit quarterly reports on the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

a. the total quantity of coal received (tons);

b. the average ash content (percent) of the coal received;

c. the average sulfur content (percent) of the coal received;

d. the average heat content (Btu/pound) of the coal received; and

e. the average sulfur dioxide emission rate (pounds sulfur dioxide per million Btu actual heat input) from the coal received.

Compliance with the sulfur dioxide emission limit shall be determined each month by calculating the average monthly sulfur dioxide emission rate, using the results of the analyses of the monthly composite sample for sulfur content and heat content.

These quarterly reports shall be submitted by January 31, April 30, July 31 and October 31 of each year, unless otherwise specified by the appropriate Ohio EPA District Office or local air agency, and shall cover the data obtained during the previous calendar quarters.

[Authority for term: OAC rule 3745-18-04(I) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;

b. an identification of each incident of deviation described in e)(2)a. above where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in e)(2)a. above where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in e)(2)a. above where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify the findings of any inspection that determined the pressure gauge for the baghouse is not operating properly. These reports shall include information required by 40 CFR Part 64.9(a).

[Authority of term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

(4) The deviation reports shall be submitted in accordance with the requirements specified in c) of Section A.2.

(5) 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 minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous six-month periods.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

(6) The permittee shall submit annual reports that specify the results of each annual inspection of the baghouse, based on the records maintained pursuant to d)(5) above. These reports shall be submitted within 45 days after each inspection is performed.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

(7) The permittee shall submit reports that include the results of the bag testing required in f)(2) below. These reports shall be submitted within 45 days after each bag test is performed.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates - Methods 1 through 5 of 40 CFR Part 60, Appendix A and the procedures and test methods specified in OAC rule 3745-17-03(B)(9).

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit

and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

[Authority for term: OAC rule 3745-15-04(A) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall conduct, or have conducted, bag testing using the bag samples collected during the annual inspection described in d)(5) above. An intent to test notification shall not be required for the testing noted in this term. The testing shall include a determination of the bag life and the bag condition. The procedures for the bag testing shall be in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

The particulate emissions shall not exceed 0.19 pound of particulate emissions per million Btu actual heat input.

Applicable Compliance Methods:

Compliance with the allowable particulate emission limitation shall be determined by using Methods 1-5 of 40 CFR Part 60, Appendix A and the procedures and test methods specified in OAC rule 3745-17-03(B)(9) as required in f)(1) above.

[Authority for term: OAC rule 3745-17-03(B)(9) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

5.22 pounds of sulfur dioxide per million Btu actual heat input

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation shall be determined by using the fuel analysis records required pursuant to d)(1) and d)(2) above and the applicable equation in OAC rule 3745-18-04(F).

If required, compliance with the allowable sulfur dioxide emission limitation above shall be determined by using Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A and the procedures in OAC rule 3745-18-04(D).

[Authority for term: OAC rule 3745-18-04(D), OAC rule 3745-18-04(F), and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

4. F004, Ash Handling

Operations, Property and/or Equipment Description:

Ash Handling

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-17-07(B)	Visible particulate emissions from any fugitive dust source shall not exceed twenty per cent opacity as a three-minute average (i.e., fly ash and/or bottom ash vacuum conveying to silos and fly ash and/or bottom ash silo load-out by auger conveying with impingement scrubber into trucks and/or railcars).
b.	OAC rule 3745-17-08	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see b)(2)a. through b)(2)c. below).

(2) Additional Terms and Conditions

a. The permittee shall employ reasonable available control measures on all fly ash and/or bottom ash vacuum conveying equipment for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintaining total enclosure of such equipment to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

[Authority for term: OAC rule 3745-17-08]

b. The permittee shall employ reasonable available control measures for the dumping of fly ash and/or bottom ash from storage silos to trucks for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed

to apply sufficient water to the fly ash and/or bottom ash during any load-out from storage silos to trucks to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

[Authority for term: OAC rule 3745-17-08]

c. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

[Authority for term: OAC rule 3745-17-08]

d. There are no vents to the atmosphere associated with the silo.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any fugitive dust source shall not exceed twenty per cent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

5. P003, Superlite

Operations, Property and/or Equipment Description:

Superlite - Organic Rubber Chemical, reactor, stripper, condensers, and filter.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-17-07(B)	Visible particulate emissions from any fugitive dust source shall not exceed twenty percent opacity, as a three-minute average.
b.	OAC rule 3745-17-08	The permittee shall use hoods, fans, and other equipment to adequately enclose, contain, capture, vent, and control the fugitive dust. Such equipment shall meet the following requirements: i. the collection efficiency shall be 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; and ii. there shall be no visible particulate emissions from the exhaust stack(s) of the control equipment.
c.	OAC rule 3745-21-09(BBB)(2)	For the Superlite (trademark) process, the VOC emissions from the reactor process vent streams, except the process emergency safety relief devices, shall be vented to a control device that is designed and operated to achieve a control efficiency of at least ninety-five per cent.
d.	40 CFR Part 63, Subpart FFFF	Based on emission calculations, all Superlite process vents have collective

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 63.2435(b), this emissions unit is an existing miscellaneous organic chemical manufacturing process unit.]	uncontrolled HAP emissions less than 200 pounds per year thus meeting the definition of Group 2 batch process vents. This emission unit has only Group 2 storage tanks and has no transfer operations that meet the definition of a transfer rack.
e.	40 CFR Part 63, Subpart A (40 CFR Part 63.2540)	Table 12 to Subpart FFFF of Part 63 - Applicability of General Provisions to Subpart FFFF shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The following unit operations emit particulates: the blender which is vented to a dust collector and the raw material load-in which is vented to a dust collector.

b. The following unit operations emit VOC: the reactor, the filter, the stripper jet, the blend tank, the styrene weigh tank, and the pre-coat which are vented to a flare and the associated piping (i.e., connectors, flanges, pumps, etc.).

c. All collected gas shall be vented to an open flare designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, as determined by Method 22 of Appendix A of 40 CFR Part 60, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

ii. The flare shall be operated with a flame present at all times when gases are vented to it. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. The net heating value of the gas being combusted and the actual exit velocity shall be calculated as required in the Testing Section of this permit.

iii. The flare shall be non-assisted and shall comply with the following requirements for the heat content in b)(2)c.iii.(a) below and the maximum tip velocity in b)(2)c.iii(b) below or shall comply with the alternative requirements in b)(2)c.iii.(c) below for non-assisted flares:

(a) the non-assisted flare shall have a net heating value of 200 Btu/scf (7.45 MJ/scm) for the gas being combusted.

The net heating value of the gas being combusted shall be calculated as required in the Testing Section of this permit.

(b) the non-assisted flare shall be designed for and operated with an exit velocity of less than 18.3 m/sec (60 ft/sec), with the following exceptions:

(i) steam-assisted and non-assisted flares, having a net heating value of 1,000 Btu/scf (37.3 MJ/scm) for the gas being combusted, can be designed for and operated with an exit velocity equal to or greater than 18.3 m/sec (60 ft/sec), but less than 122 m/sec (400 ft/sec); and

(ii) steam-assisted and non-assisted flares can be designed for and operated with an exit velocity of less than the velocity calculated below for V_{max}, and less than 122 m/sec (400 ft/sec):

$\text{Log10}(V_{max}) = (H_T + 28.8)/31.7$
where:

V_{max} = maximum permitted velocity, m/sec;

28.8 = constant;

31.7 = constant; and

H_T = the net heating value as determined in the Testing Section of this permit.

(c) Non-assisted flares that have a diameter of 3 inches or greater and a hydrogen content of 8.0 percent (by volume), or greater, shall be designed for and operated with an exit velocity of less than 37.2 m/sec (122 ft/sec) and less than the velocity, V_{max}, as determined by the following equation:

$V_{max} = (X_{H2} - K_1)\, K_2$

where:

V_{max} = maximum permitted velocity, m/sec;

K_1 = constant, 6.0 volume-percent hydrogen;

K_2 = constant, 3.9 (m/sec)/volume-percent hydrogen; and

X_{H2} = the volume-percent of hydrogen, on a wet basis, as calculated by using the ASTM Method D1946-90.

[Authority for term: OAC rule 3745-77-07(A)(1)]

c) Operational Restrictions

(1) A pilot flame shall be maintained at all times in the flare's pilot light burner.

[Authority for term: OAC rule 3745-77-07)].

(2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart FFFF, including the following sections:

Section:	Requirement:
63.2450	general requirements for complying with Subpart FFF
63.2480 and Table 6	requirements for equipment leak
63.2485 and Table 7	requirements for wastewater streams and liquid streams in open systems
63.2490 and Table 10	requirements for heat exchange systems

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall monitor the flare to ensure that it is operated and maintained in conformance with its design and the requirements contained in this permit.

[Authority for term: OAC rule 3745-21-09(B)(4)(d) and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall record the following information each day for the flare and process operations:

a. all periods during which there was no pilot flame; and

b. the operating times for the capture (collection) system, the flare, the monitoring equipment, and the associated emissions unit.

[Authority for term: OAC rule 3745-21-09(B)(4)(b)(i) & (x) and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) 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 location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(5)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(6) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart FFFF, including the following sections:

Section:	Requirement:
63.2480 and Table 6	requirements for equipment leak
63.2485 and Table 7	requirements for wastewater streams and liquid streams in open systems
63.2490 and Table 10	requirements for heat exchange systems
63.2525	records that must be kept

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, the flare, the monitoring equipment, and the associated emissions unit; and

b. identify all periods of time during which the pilot flame was not functioning properly or the flare was not maintained as required in this permit. The reports shall include the date, time, and duration of each such period.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(4)(c), and OAC rule 3745-77-07(C)(1)].

(2) The deviation reports shall be submitted in accordance with the requirements specified in c) of Section A.2.

(3) 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 Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The permittee shall submit semiannual reports and other such notifications to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR Part 63, Subpart FFFF, per the following sections:

Section:	Requirement:
63.2480 and Table 6	requirements for equipment leak
63.2485 and Table 7	requirements for wastewater streams and liquid streams in open systems
63.2490 and Table 10	requirements for heat exchange systems
63.2515	notifications that must be submitted
63.2520 and Table 11	reports that must be submitted

f) Testing Requirements

(1) The permittee shall conduct an initial flare compliance assessment for this emissions unit in accordance with the following requirements:

a. The compliance assessment shall be conducted within 180 days of the startup of the flare.

b. The compliance assessment shall be conducted to demonstrate compliance with the net heating value for the gas being combusted and the maximum permitted exit velocity.

c. The following test method(s) and calculations shall be employed to demonstrate compliance with the allowable net heating value for the gas being combusted, the maximum permitted exit velocity, and the actual exit velocity:

i. The net heating value of the gas being combusted at the flare shall be calculated as follows:

H_T = k x [the summation of (C_i) x (H_i) from i=1 to i=n]
where:

H_T = net heating value of the sample, MJ/scm; where the net enthalpy per mole of off gas is based on combustion at 25 degrees Celsius and 760 mm Hg, but the standard temperature of 20 degrees Celsius is used for determining the volume corresponding to one mole;

k = constant, 1.740×10^{-7} (1/ppm) (g mole/scm) (MJ/kcal), where the standard temperature for "g mole/scm" is 20 degrees Celsius;

C_i = concentration of sample component "i" in ppm on a wet basis, as measured for organics by Reference Method 18 and measured for hydrogen and carbon monoxide by ASTM D1946–77 or 90; and

H_i = net heat of combustion of sample component "i", kcal/g mole at 25 degrees Celsius and 760 mm Hg. The heats of combustion may be determined using ASTM D2382-76 or 88 or ASTM D4809-95 if published values are not available or cannot be calculated.

i = subscript denoting a specific component in the sample.

n = total number of components within the sample.

The conversion factor of "26.84 Btu scm/MJ scf" can be used to convert the net heating value of the gas (H_T) from MJ/scm to Btu/scf.

ii. The actual exit velocity of the flare shall be determined by dividing the volumetric flow rate (in units of standard temperature and pressure) of the flare header or headers that feed the flare, as determined by Reference Methods 2, 2A, 2C, or 2D (found in 40 CFR 60, Appendix A), as

appropriate, by the unobstructed (free) cross-sectional area of the flare tip.

The conversion factor of "3.281 ft/m" can be used to convert the velocity from m/sec to ft/sec.

iii. If necessary, the maximum permitted velocity V_{max}, shall be calculated as described in b)(2)c. above.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) Compliance with the emission limitations in b)(1) and b)(2)c. above shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

Visible particulate emissions from any fugitive dust source shall not exceed twenty percent opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(3).

[Authority for term: OAC rule 3745-17-03(C)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

There shall be no visible particulate emissions from the exhaust stack(s) of the control equipment.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 22 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(4).

[Authority for term: OAC rule 3745-17-03(B)(4) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

For the Superlite (trademark) process, the VOC emissions from the reactor process vent streams, except the process emergency safety relief devices, shall be vented to a control device that is designed and operated to achieve a control efficiency of at least ninety-five per cent.

Applicable Compliance Method:

Compliance with the allowable VOC control efficiency shall be assumed based upon demonstrating compliance with the net heating value for the gas being combusted and the maximum permitted exit velocity as determined in f)(1) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

No visible emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22, and procedures specified in 40 CFR Part 60.18.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart FFFF, including the following sections:

Section:	Requirement:
63.2480 and Table 6	requirements for equipment leak
63.2485 and Table 7	requirements for wastewater streams and liquid streams in open systems
63.2490 and Table 10	requirements for heat exchange systems

g) Miscellaneous Requirements

(1) None.

6. P005, A/O Blends

Operations, Property and/or Equipment Description:

A/O Blends - ribbon blenders, mills, rotary screen, bagger

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)	1.98 pounds of particulate emissions (PE) per hour (total from both baghouses combined)

(2) Additional Terms and Conditions

a. The following unit operations emit particulates: the charging hopper, the blender, the two hoppers, the fitz mill, the delumper, the drum filling station, the three feeders, the two screeners, the surge hopper, the pellet mill, the bagging station, and the associated conveying and transfer points which are vented to either baghouse #1 or baghouse #2.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across each baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across each baghouse on a daily basis.

Whenever the monitored values for the pressure drop deviates from the ranges specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and 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 ranges specified below, 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: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across baghouse #1 is 0.1 to 2.0 inches of water.

The acceptable range for the pressure drop across baghouse #2 is 1.8 to 3.9 inches of water.

These ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the ranges based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks 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 stack identification;

b. the color of the emissions;

c. whether the emissions are representative of normal operations;

d. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

e. the total duration of any visible emission incident; and

f. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(2)e. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

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

a. each period of time when the pressure drop across either baghouse was outside of the acceptable range;

b. an identification of each incident of deviation described in e)(1)a. above where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in e)(1)a. above where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in e)(1)a. above where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The deviation reports shall be submitted in accordance with the requirements specified in c) of Section A.2.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

1.98 pounds of PE per hour (total from both baghouses combined)

Applicable Compliance Method:

If required, compliance with the particulate emission limitation shall be determined using Methods 1-5 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

7. P006, ARD

Operations, Property and/or Equipment Description:

Agerite Resin D - Organic Rubber Chemical Antioxidant - reactors, washers, stills, recovery and finishing equipment

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 (PTI 16-1525)	0.96 pound of volatile organic compounds (VOC) per hour 6.35 pounds of particulate emissions (PE) per hour See b)(2)c. below.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-09(BBB)(1)	For the agerite resin D process, the VOC emissions from the recovery system vents and product neutralization and distillation system vents, except wash kettles (or still feed) condenser vents, stills, vacuum jet tailpipe vents, and process emergency safety relief devices, shall not exceed 1.0 ton per year.
e.	40 CFR Part 63, Subpart FFFF [In accordance with 40 CFR 63.2435(b), this emissions unit is an existing miscellaneous organic chemical manufacturing process	Reduce uncontrolled organic HAP emissions from one or more batch process vents within the process by venting through a closed-vent system to a flare.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	unit.]	[Authority for term: Table 2 and section 63.2460(a) of 40 CFR Part 63, Subpart FFFF]
f.	40 CFR Part 63, Subpart A (40 CFR Part 63.2540)	Table 12 to Subpart FFFF of Part 63 - Applicability of General Provisions to Subpart FFFF shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
g.	OAC rule 3745-21-09(B)(4)(b)(i) and (x)	See d)(5) below.

(2) Additional Terms and Conditions

a. The following unit operations emit particulates: the pastille system, the pastille storage, and the packaging station which are vented to a baghouse.

b. The following unit operations emit VOC: the acetone recovery system, the aniline recovery system, the recovery system feed tank, the charge make-up system, the reaction system, the product neutralization system, the product distillation system which are vented to the flare and the associated piping (i.e., connectors, flanges, pumps, etc.).

c. All collected gas shall be vented to an open flare designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, as determined by Method 22 of Appendix A of 40 CFR Part 60, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

ii. The flare shall be operated with a flame present at all times when gases are vented to it. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. The net heating value of the gas being combusted and the actual exit velocity shall be calculated as required in the Testing Section of this permit.

iii. The flare shall be non-assisted and shall comply with the following requirements for the heat content in b)(2)c.iii.(a) below and the maximum tip velocity in paragraph b)(2)c.iii.(b) below or shall comply with the alternative requirements in paragraph b)(2)c.iii.(c) below for non-assisted flares:

(a) the non-assisted flare shall have a net heating value of 200 Btu/scf (7.45 MJ/scm) for the gas being combusted.

The net heating value of the gas being combusted shall be calculated as required in the Testing Section of this permit.

(b) the non-assisted flare shall be designed for and operated with an exit velocity of less than 18.3 m/sec (60 ft/sec), with the following exceptions:

(i) steam-assisted and non-assisted flares, having a net heating value of 1,000 Btu/scf (37.3 MJ/scm) for the gas being combusted, can be designed for and operated with an exit velocity equal to or greater than 18.3 m/sec (60 ft/sec), but less than 122 m/sec (400 ft/sec); and

(ii) steam-assisted and non-assisted flares can be designed for and operated with an exit velocity of less than the velocity calculated below for V_{max}, and less than 122 m/sec (400 ft/sec):

$\text{Log10}(V_{max}) = (H_T + 28.8)/31.7$
where:

V_{max} = maximum permitted velocity, m/sec;

28.8 = constant;

31.7 = constant; and

H_T = the net heating value as determined in the Testing Section of this permit.

(c) Non-assisted flares that have a diameter of 3 inches or greater and a hydrogen content of 8.0 percent (by volume), or greater, shall be designed for and operated with an exit velocity of less than 37.2 m/sec (122 ft/sec) and less than the velocity, V_{max}, as determined by the following equation:

$V_{max} = (X_{H2} - K_1)\, K_2$

where:

V_{max} = maximum permitted velocity, m/sec;

K_1 = constant, 6.0 volume-percent hydrogen;

K_2 = constant, 3.9 (m/sec)/volume-percent hydrogen; and

X_{H2} = the volume-percent of hydrogen, on a wet basis, as calculated by using the ASTM Method D1946-90.

[Authority for term: OAC rule 3745-31-05]

c) Operational Restrictions

(1) A pilot flame shall be maintained at all times in the flare's pilot light burner.

[Authority for term: OAC rule 3745-31-05]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart FFFF, including the following sections:

Section:	Requirement:
63.2450(e)(2)	requirements for the flare
63.2480 and Table 6	requirements for equipment leak
63.2490 and Table 10	requirements for heat exchange systems

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and 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 specified below, 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: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 3.5 to 6.0 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the

allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(2)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall monitor the flare to ensure that it is operated and maintained in conformance with its design and the requirements contained in this permit.

[Authority for term: OAC rule 3745-31-05, OAC rule 3745-21-09(B)(4)(d), and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The permittee shall record the following information each day for the flare and process operations:

a. all periods during which there was no pilot flame; and

b. the operating times for the capture (collection) system, the flare, the monitoring equipment, and the associated emissions unit.

[Authority for term: OAC rule 3745-31-05, OAC rule 3745-21-09(B)(4)(b)(i) & (x), and OAC rule 3745-77-07(C)(1)]

(6) The permittee shall collect and record the following information for this emissions unit each month:

a. the amount of VOC from the recovery system vents and product neutralization and distillation system vents, except wash kettles (or still feed) condenser vents, stills vacuum jet tailpipe vents, and process emergency safety relief devices that is vented to the flare, in tons; and

b. the amount of VOC emitted from the flare (i.e., d)(6)a. times (1- 0.98*).

*The control efficiency of the flare is assumed to be 98%.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

(7) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart FFFF, including the following sections:

Section:	Requirement:
63.2450(f)(2)	records for the flare
63.2480 and Table 6	requirements for equipment leak
63.2490 and Table 10	requirements for heat exchange systems
63.2525	records that must be kept

e) Reporting Requirements

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

a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;

b. an identification of each incident of deviation described in e)(1)a. above where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in e)(1)a. above where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in e)(1)a. above where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) 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 minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, the flare, the monitoring equipment, and the associated emissions unit; and

b. identify all periods of time during which the pilot flame was not functioning properly or the flare was not maintained as required in this permit. The reports shall include the date, time, and duration of each such period.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-31-05, OAC rule 3745-21-09(B)(4)(c), and OAC rule 3745-77-07(C)(1)]

(4) The deviation reports shall be submitted in accordance with the requirements specified in c) of Section A.2.

(5) The permittee shall also submit annual reports which specify the total VOC emissions from the recovery system vents and product neutralization and distillation system vents, except wash kettles (or still feed) condenser vents, stills vacuum jet tailpipe vents, and process emergency safety relief devices for the previous calendar year. These reports shall include the calculations of the total VOC emissions and shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

(6) The permittee shall submit semiannual reports and other such notifications to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR Part 63, Subpart FFFF, per the following sections:

Section:	Requirement:
63.2480 and Table 6	requirements for equipment leak
63.2490 and Table 10	requirements for heat exchange systems
63.2515	notifications that must be submitted
63.2520 and Table 11	reports that must be submitted

f) Testing Requirements

(1) The permittee shall conduct an initial flare compliance assessment for this emissions unit in accordance with the following requirements:

a. The compliance assessment shall be conducted within 180 days of the startup of the flare.

b. The compliance assessment shall be conducted to demonstrate compliance with the net heating value for the gas being combusted and the maximum permitted exit velocity.

c. The following test method(s) and calculations shall be employed to demonstrate compliance with the allowable net heating value for the gas being combusted, the maximum permitted exit velocity, and the actual exit velocity:

i. The net heating value of the gas being combusted at the flare shall be calculated as follows:

H_T = k x [the summation of (C_i) x (H_i) from i=1 to i=n]
where:

H_T = net heating value of the sample, MJ/scm; where the net enthalpy per mole of off gas is based on combustion at 25 degrees Celsius and 760 mm Hg, but the standard temperature of 20 degrees Celsius is used for determining the volume corresponding to one mole;

k = constant, 1.740 x 10^{-7} (1/ppm) (g mole/scm) (MJ/kcal), where the standard temperature for “g mole/scm” is 20 degrees Celsius;

C_i = concentration of sample component “i” in ppm on a wet basis, as measured for organics by Reference Method 18 and measured for hydrogen and carbon monoxide by ASTM D1946–77 or 90; and

H_i = net heat of combustion of sample component “i”, kcal/g mole at 25 degrees Celsius and 760 mm Hg. The heats of combustion may be determined using ASTM D2382-76 or 88 or ASTM D4809-95 if published values are not available or cannot be calculated.

i = subscript denoting a specific component in the sample.

n = total number of components within the sample.

The conversion factor of "26.84 Btu scm/MJ scf" can be used to convert the net heating value of the gas (H_T) from MJ/scm to Btu/scf.

ii. The actual exit velocity of the flare shall be determined by dividing the volumetric flow rate (in units of standard temperature and pressure) of the flare header or headers that feed the flare, as determined by Reference Methods 2, 2A, 2C, or 2D (found in 40 CFR 60, Appendix A), as appropriate, by the unobstructed (free) cross-sectional area of the flare tip.

The conversion factor of "3.281 ft/m" can be used to convert the velocity from m/sec to ft/sec.

iii. If necessary, the maximum permitted velocity V_{max}, shall be calculated as described in section b)(2)c. of this permit.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

(2) Compliance with the emission limitations in b)(1) and b)(2)c above shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-31-05, OAC rule 3745-17-03(B)(1), and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

6.35 pounds of PE per hour

Applicable Compliance Method:

If required, compliance with the hourly PE limitation shall be determined by using Methods 1-5 of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

For the agerite resin D process, the VOC emissions from the recovery system vents and product neutralization and distillation system vents, except wash kettles (or still feed) condenser vents, stills, vacuum jet tailpipe vents, and process emergency safety relief devices, shall not exceed 1.0 ton per year.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be demonstrated through record keeping requirements established in d(6) above.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

0.96 pound of VOC per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determined by multiplying the maximum amount of VOC vented from this emissions unit to the flare by (1-0.98*).

*The control efficiency of the flare is assumed to be 98%.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

No visible emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22, and procedures specified in 40 CFR Part 60.18.

[Authority for term: OAC rule 3745-31-05 and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart FFFF, including the following sections:

Section:	Requirement:
63.2450(f)(1)	requirements for flare compliance assessments
63.2480 and Table 6	requirements for equipment leak

g) Miscellaneous Requirements

(1) None.

8. P007, Synthetic Rubber Latex

Operations, Property and/or Equipment Description:

Synthetic Rubber Latex Manufacturer - polymerizers, blowdown tanks, concentrators, blend tanks, etc.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-21-07(G)(2)	85 percent overall control efficiency for organic compounds (OC)
b.	OAC rule 3745-21-07(G)(6)	90 percent destruction of OC
c.	40 CFR Part 63, Subpart U [In accordance with 40 CFR 63.480(a)(2), this emissions unit is an existing elastomer product process unit subject to the emissions limitations/ control measures specified in this section.]	For each aggregate batch vent stream, reduce organic HAP emissions by 90 weight percent or to a concentration of 20 ppmv, whichever is less stringent, on a continuous basis using a control device. For purposes of complying with the 20 ppmv outlet concentration standard, the outlet concentration shall be calculated on a dry basis. When a combustion device is used for purposes of complying with the 20 ppmv outlet concentration standard, the concentration shall be corrected to 3 percent oxygen if supplemental combustion air is used to combust the emissions. If supplemental combustion air is not used, a correction to 3 percent oxygen is not required. [Authority for term: 40 CFR 63.487(b)(2)]
d.	40 CFR 63.1-15	Table 1 to Subpart U of Part 63 - Applicability of General Provisions to Subpart U shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
e.	40 CFR Part 63, Subparts F, G, & H	Table 2 to Subpart U of Part 63 - Applicability of Subparts F, G, & H of Part

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		63 shows which parts of these Subparts are applicable.

(2) Additional Terms and Conditions

a. The following unit operations emit OC and are subject to OAC rule 3745-21-07(G)(2) and 40 CFR Part 63, Subpart U: the reactors, the blowdown tank, the thin-film evaporation, the vacuum jets, and the foam knockdown tank which are vented to either the coal fired boiler (B008) or the natural gas fired boiler (B001) and the associated piping (i.e., connectors, flanges, pumps, etc.).

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart U, including the following sections:

Section:	Requirement:
Table 7	minimum firebox temperature for the boiler
63.506(b)(1)	startup, shutdown, and malfunction plan
63.501	maintenance wastewater requirements
63.502	equipment leak and heat exchange system provisions
63.505(a)	establishment of parameter monitoring levels
63.505(b)(4)	establishment of parameter monitoring levels based exclusively on performance tests - aggregate batch vent streams
63.505(g)	parameter monitoring excursion definitions
63.505(i)	excused excursions

d) Monitoring and/or Recordkeeping Requirements

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

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

a. the daily average temperature in the firebox of the boiler; and

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

Whenever the monitored values for the daily average temperature in the firebox of the boiler deviate from the values specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and 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 values specified below, 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: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the daily average temperature in the firebox of the boiler, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the daily average temperature in the firebox of the coal boiler (B008) shall not be below 1075 degrees Fahrenheit or shall not be below the minimum temperature established during the most recent emission test that demonstrated the emissions unit was in compliance.

An acceptable value for the daily average temperature in the firebox of the gas boiler (B001) shall not be below 1444.7 degrees Fahrenheit or shall not be below the minimum temperature established during the most recent emission test that demonstrated the emissions unit was in compliance.

The values are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the values based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission limitations for this emissions unit. In addition, approved revisions to the values will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart U, including the following sections:

Section:	Requirement:
63.484	storage vessel provisions
63.489(a)	general requirements for monitoring equipment
63.489(b)(3)	a continuous temperature monitoring device in the firebox
63.489(e)	establishment of parameter monitoring levels
63.491(b)	compliance demonstration records
63.491(c)	establishment of parameter monitoring level records
63.491(f)(2)	daily average value of the firebox temperature
63.501	maintenance wastewater requirements
63.502	equipment leak and heat exchange system provisions
63.506(a)	data retention
63.506(b)	Subpart A requirements
63.506(b)(1)(i)	records of start-up, shutdown, and malfunction
63.506(c)	application for approval of construction or reconstruction
63.506(d)	recordkeeping and documentation

e) Reporting Requirements

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

a. all days which the daily average temperature in the firebox of the coal boiler (B008) does not comply with the temperature limitation specified above;

b. all days which the daily average temperature in the firebox of the gas boiler (B001) does not comply with the temperature limitation specified above;

c. an identification of each incident of deviation described in e)(1)a. or e)(1)b. above where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in e)(1)a. or e)(1)b. above where prompt corrective action, that would bring the daily average temperature in the firebox for the coal boiler or the gas boiler into compliance with the acceptable value, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in e)(1)a. or e)(1)b. above where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit semiannual reports and other such notifications to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR Part 63, Subpart U, per the following sections:

Section:	Requirement:
63.492	Batch front-end process vents reporting requirements
63.502	equipment leak and heat exchange system provisions
63.506(b)(1)(ii)	reports of start-up, shutdown, and malfunction
63.506(e)	reporting and notification

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following method:

a. Emission Limitations:

85 percent overall control efficiency for OC

90 percent destruction of OC

Applicable Compliance Method:

If required, compliance with the OC emission limitations shall be determined by using Methods 1-4 and 25 or 25A of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

For each aggregate batch vent stream, reduce organic HAP emissions by 90 weight percent or to a concentration of 20 ppmv, whichever is less stringent, on a continuous basis using a control device. For purposes of complying with the 20 ppmv outlet concentration standard, the outlet concentration shall be calculated on a dry basis. When a combustion device is used for purposes of complying with the 20 ppmv outlet concentration standard, the concentration shall be corrected to 3 percent oxygen if supplemental combustion air is used to combust

the emissions. If supplemental combustion air is not used, a correction to 3 percent oxygen is not required.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable organic HAP emission limitation based on the results of emission testing conducted in accordance sections 63.490(e) and 63.504 of 40 CFR Part 63,Subpart U.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart U, including the following sections:

Section:	Requirement:
63.490(e)	aggregate batch vent stream testing for compliance with section 63.487(b)(2)
63.502	equipment leak and heat exchange system provisions
63.504	additional requirements for performance testing

g) Miscellaneous Requirements

(1) None.

9. P012, DEPA

Operations, Property and/or Equipment Description:

DEPA - Organic Rubber Chemical - reactor, wash tank, feed tank, filter

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-21-07(G)(2)	See c)(1) below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall not employ any liquid organic material that meets the definition of photochemically reactive material as defined by OAC rule 3745-21-01(C)(5) in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following information for this emissions unit:

a. the identification of each liquid organic material employed in this emissions unit;

b. the MSDS sheets for each liquid organic material employed in this emissions unit; and

c. documentation as to whether or not each liquid organic material is a photochemically reactive material as defined by OAC rule 3745-21-01(C)(5)

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a photochemically reactive liquid organic material (as defined in OAC rule 3745-21-01(C)(5)) is employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA or local air agency) within 45 days after such an occurrence.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

10. P016, DPA A/O

Operations, Property and/or Equipment Description:

DPA A/O - Petroleum Additives & Rubber Antioxidants - reactors, washers, stills, filter, recovery equipment

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 (PTI 16-1843)	2.0 pounds of volatile organic compounds (VOC) per hour 8.8 tons of VOC per year See b)(2)b. below.
b.	OAC rule 3745-21-09(BBB)(3)	For the diphenylamine-based antioxidants process, the VOC emissions from the reactor process vent streams, except the emulsion recovery system tank vent, recovered MND tank vent, and process emergency safety relief devices, shall be vented to a control device that is designed and operated to achieve a control efficiency of at least ninety-five percent, by weight.
c.	40 CFR Part 63, Subpart FFFF [In accordance with 40 CFR 63.2435(b), this emissions unit is an existing miscellaneous organic chemical manufacturing process unit.]	Based on emission calculations, all DPA A/O process vents have collective uncontrolled HAP emissions less than 200 pounds per year thus meeting the definition of Group 2 batch process vents. This emission unit has only Group 2 storage tanks and has no transfer operations that meet the definition of a transfer rack.
d.	40 CFR Part 63, Subpart A (40 CFR Part 63.2540)	Table 12 to Subpart FFFF of Part 63 - Applicability of General Provisions to Subpart FFFF shows which parts of the General Provisions in 40 CFR 63.1-15

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		apply.

(2) Additional Terms and Conditions

a. The following unit operations emit VOC: the north and south recovered hydrocarbon feed tanks; the north and south hydrocarbon feed tanks; the north and south reactors; the north and south receivers; MND tank; the north and south weigh tanks; the north and south wash tanks; the north and south strippers; the north and south crude storage tanks; the north and south stills; the recovered DPA tank; the north and south tars; the gel churn; the north and south vent tanks; the effluent tank, the hold tanks; and the jets which are vented to the flare; and the associated piping (i.e., connectors, flanges, pumps, etc.).

b. All collected gas shall be vented to an open flare designed and operated as follows:

i. The flare shall be designed for and operated with no visible emissions, as determined by Method 22 of Appendix A of 40 CFR Part 60, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

ii. The flare shall be operated with a flame present at all times when gases are vented to it. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. The net heating value of the gas being combusted and the actual exit velocity shall be calculated as required in the Testing Section of this permit.

iii. The flare shall be non-assisted and shall comply with the following requirements for the heat content in paragraph b)(2)b.iii.(a) below and the maximum tip velocity in paragraph b)(2)b.iii.(b) below or shall comply with the alternative requirements in paragraph b)(2)b.iii.(c) below for non-assisted flares:

(a) a. the non-assisted flare shall have a net heating value of 200 Btu/scf (7.45 MJ/scm) for the gas being combusted.

The net heating value of the gas being combusted shall be calculated as required in the Testing Section of this permit.

(b) the non-assisted flare shall be designed for and operated with an exit velocity of less than 18.3 m/sec (60 ft/sec), with the following exceptions:

(i) steam-assisted and non-assisted flares, having a net heating value of 1,000 Btu/scf (37.3 MJ/scm) for the gas being combusted, can be designed for and operated with an exit velocity equal to or greater than 18.3 m/sec (60 ft/sec), but less than 122 m/sec (400 ft/sec); and

(ii) steam-assisted and non-assisted flares can be designed for and operated with an exit velocity of less than the velocity calculated below for V_{max}, and less than 122 m/sec (400 ft/sec):

$$\text{Log10}\ (V_{max}) = (H_T + 28.8)/31.7$$

where:

V_{max} = maximum permitted velocity, m/sec;

28.8 = constant;

31.7 = constant; and

H_T = the net heating value as determined in the Testing Section of this permit.

(c) Non-assisted flares that have a diameter of 3 inches or greater and a hydrogen content of 8.0 percent (by volume), or greater, shall be designed for and operated with an exit velocity of less than 37.2 m/sec (122 ft/sec) and less than the velocity, V_{max}, as determined by the following equation:

$$V_{max} = (X_{H2} - K_1)\ K_2$$

where:

V_{max} = maximum permitted velocity, m/sec;

K_1 = constant, 6.0 volume-percent hydrogen;

K_2 = constant, 3.9 (m/sec)/volume-percent hydrogen; and

X_{H2} = the volume-percent of hydrogen, on a wet basis, as calculated by using the ASTM Method D1946-90.

[Authority for term: OAC rule 3745-31-05(A)(3)]

c) Operational Restrictions

(1) A pilot flame shall be maintained at all times in the flare's pilot light burner.

[Authority for term: OAC rule 3745-31-05(A)(3)]

(2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart FFFF, including the following sections:

Section:	Requirement:
63.2450	general requirements for complying with Subpart FFF

63.2480 and Table 6	requirements for equipment leak
63.2485 and Table 7	requirements for wastewater streams and liquid streams in open systems
63.2490 and Table 10	requirements for heat exchange systems

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall monitor the flare to ensure that it is operated and maintained in conformance with its design and the requirements contained in this permit.

[Authority for term: OAC rule 3745-31-05, OAC rule 3745-21-09(B)(4)(d), and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall record the following information each day for the flare and process operations:

a. all periods during which there was no pilot flame; and

b. the operating times for the capture (collection) system, the flare, the monitoring equipment, and the associated emissions unit.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(4)(b)(i) & (x), and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart FFFF, including the following sections:

Section:	Requirement:
63.2480 and Table 6	requirements for equipment leak
63.2485 and Table 7	requirements for wastewater streams and liquid streams in open systems
63.2490 and Table 10	requirements for heat exchange systems
63.2525	records that must be kept

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, the flare, the monitoring equipment, and the associated emissions unit; and

b. identify all periods of time during which the pilot flame was not functioning properly or the flare was not maintained as required in this permit. The reports shall include the date, time, and duration of each such period.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(4)(c), and OAC rule 3745-77-07(C)(1)]

(2) The deviation reports shall be submitted in accordance with the requirements specified in c) of Section A.2.

(3) The permittee shall submit semiannual reports and other such notifications to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR Part 63, Subpart FFFF, per the following sections:

Section:	Requirement:
63.2480 and Table 6	requirements for equipment leak
63.2485 and Table 7	requirements for wastewater streams and liquid streams in open systems
63.2490 and Table 10	requirements for heat exchange systems
63.2515	notifications that must be submitted
63.2520 and Table 11	reports that must be submitted

f) Testing Requirements

(1) The permittee shall conduct an initial flare compliance assessment for this emissions unit in accordance with the following requirements:

a. The compliance assessment shall be conducted within 180 days of the startup of the flare.

b. The compliance assessment shall be conducted to demonstrate compliance with the net heating value for the gas being combusted and the maximum permitted exit velocity.

c. The following test method(s) and calculations shall be employed to demonstrate compliance with the allowable net heating value for the gas being combusted, the maximum permitted exit velocity, and the actual exit velocity:

i. The net heating value of the gas being combusted at the flare shall be calculated as follows:

H_T = k x [the summation of (C_i) x (H_i) from i=1 to i=n]

where:

H_T = net heating value of the sample, MJ/scm; where the net enthalpy per mole of off gas is based on combustion at 25 degrees Celsius and 760 mm Hg, but the standard temperature of 20 degrees Celsius is used for determining the volume corresponding to one mole;

k = constant, 1.740 x 10^{-7} (1/ppm) (g mole/scm) (MJ/kcal), where the standard temperature for "g mole/scm" is 20 degrees Celsius;

C_i = concentration of sample component "i" in ppm on a wet basis, as measured for organics by Reference Method 18 and measured for hydrogen and carbon monoxide by ASTM D1946–77 or 90; and

H_i = net heat of combustion of sample component "i", kcal/g mole at 25 degrees Celsius and 760 mm Hg. The heats of combustion may be determined using ASTM D2382-76 or 88 or ASTM D4809-95 if published values are not available or cannot be calculated.

i = subscript denoting a specific component in the sample.

n = total number of components within the sample.

The conversion factor of "26.84 Btu scm/MJ scf" can be used to convert the net heating value of the gas (H_T) from MJ/scm to Btu/scf.

ii. The actual exit velocity of the flare shall be determined by dividing the volumetric flow rate (in units of standard temperature and pressure) of the flare header or headers that feed the flare, as determined by Reference Methods 2, 2A, 2C, or 2D (found in 40 CFR 60, Appendix A), as appropriate, by the unobstructed (free) cross-sectional area of the flare tip.

The conversion factor of "3.281 ft/m" can be used to convert the velocity from m/sec to ft/sec.

iii. If necessary, the maximum permitted velocity V_{max}, shall be calculated as described in b)(2)b. above.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the

proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) Compliance with the emission limitations in b)(1) and b)(2)b. above shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

For the diphenylamine-based antioxidants process, the VOC emissions from the reactor process vent streams, except the emulsion recovery system tank vent, recovered MND tank vent, and process emergency safety relief devices, shall be vented to a control device that is designed and operated to achieve a control efficiency of at least ninety-five per cent, by weight.

<u>Applicable Compliance Method:</u>

Compliance with the allowable VOC control efficiency shall be assumed based upon demonstrating compliance with the net heating value for the gas being combusted and the maximum permitted exit velocity as determined in f)(1) above.

[Authority for term: OAC rule 3745-31-5(A)(3) and OAC rule 3745-77-07(C)(1)]

b. <u>Emission Limitation:</u>

2.0 pounds of VOC per hour for fugitive and stack emissions

<u>Applicable Compliance Method:</u>

Compliance with the hourly allowable VOC emission limitation shall be determined by multiplying the maximum amount of VOC vented from this emissions unit to the flare by (1-0.98*) for stack emissions plus the VOC emission rate, in pounds per hour, determined from EPA-453/R-95-017 "Protocol for Equipment Leak Emission Estimates" for fugitive emissions.

*The control efficiency of the flare is assumed to be 98%.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

8.8 tons of VOC per year for stack and fugitive emissions

Applicable Compliance Method:

The annual allowable VOC emission limitation above was determined by multiplying the hourly allowable VOC emission limitation by 8760 hours per year, and then dividing by 2000. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

No visible emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22, and procedures specified in 40 CFR Part 60.18.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart FFFF, including the following sections:

Section:	Requirement:
63.2480 and Table 6	requirements for equipment leak
63.2485 and Table 7	requirements for wastewater streams and liquid streams in open systems
63.2490 and Table 10	requirements for heat exchange systems

g) Miscellaneous Requirements

(1) None.

11. P020, RLP

Operations, Property and/or Equipment Description:

RLP - Reactive Liquid Polymers - reactors, processing vessels, product purification, finishing, and raw material recovery

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 (PTI 16-395)	117.94 tons of volatile organic compounds (VOC) per year
b.	OAC rule 3745-21-07(G)(2)	85 percent overall control efficiency for organic compounds (OC)
c.	OAC rule 3745-21-07(G)(6)	90 percent destruction of OC
d.	40 CFR Part 63, Subpart U [In accordance with 40 CFR 63.480(a)(2), this emissions unit is an existing elastomer product process unit subject to the emissions limitations/ control measures specified in this section.]	For each aggregate batch vent stream, reduce organic HAP emissions by 90 weight percent or to a concentration of 20 ppmv, whichever is less stringent, on a continuous basis using a control device. For purposes of complying with the 20 ppmv outlet concentration standard, the outlet concentration shall be calculated on a dry basis. When a combustion device is used for purposes of complying with the 20 ppmv outlet concentration standard, the concentration shall be corrected to 3 percent oxygen if supplemental combustion air is used to combust the emissions. If supplemental combustion air is not used, a correction to 3 percent oxygen is not required. [Authority for term: 40 CFR 63.487(b)(2)]
e.	40 CFR 63.1-15	Table 1 to Subpart U of Part 63 - Applicability of General Provisions to Subpart U shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR Part 63, Subparts F, G, & H	Table 2 to Subpart U of Part 63 - Applicability of Subparts F, G, & H of Part 63 shows which parts of these Subparts are applicable.

(2) Additional Terms and Conditions

a. The following unit operations emit OC: the RM charging system, the CTBN reactors, the blowdown tanks, the wet rubber storage tanks, the dryer system, the drumming station, the monomer and solvent recovery systems, the AEP storage tank, the post RXN & blending system, and the vent collection tanks which are controlled with a thermal incinerator and/or condenser and the roof vent tank and the associated piping (i.e., connectors, flanges, pumps, etc.).

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart U, including the following sections:

Section:	Requirement:
Table 7	minimum firebox temperature for the boiler
63.506(b)(1)	startup, shutdown, and malfunction plan
63.501	maintenance wastewater requirements
63.502	equipment leak and heat exchange system provisions
63.505(a)	establishment of parameter monitoring levels
63.505(b)(4)	establishment of parameter monitoring levels based exclusively on performance tests - aggregate batch vent streams
63.505(g)	parameter monitoring excursion definitions
63.505(i)	excused excursions

d) Monitoring and/or Recordkeeping Requirements

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

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

a. the daily average temperature in the firebox of the thermal incinerator; and

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

Whenever the monitored value for the daily average temperature in then firebox of the thermal incinerator deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and 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 value specified below, 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: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the daily average temperature in the firebox of the thermal incinerator, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the daily average temperature in the firebox of the thermal incinerator shall not be below 1379 degrees Fahrenheit or shall not be below the minimum temperature established during the most recent emission test that demonstrated the emissions unit was in compliance.

The value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission limitations for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall collect and record the following information for this emissions unit each month:

a. the amount of volatile organic material charged, in tons;

b. the amount of volatile organic material converted to product, in tons;

c. the amount of volatile organic material recovered, in tons;

d. the amount of volatile organic material converted to waste, in tons;

e. the amount of volatile organic material sent to the oxidizer (i.e., d)(2)a. minus d)(2)b. minus d)(2)c. minus d)(2)d.), in tons;

f. the fugitive and hose volatile organic compounds emissions, in tons;

g. the amount of volatile organic compounds emitted from the thermal oxidizer (i.e., d)(2)e. times (1- the destruction efficiency)); and

h. the total volatile organic compounds emission rate (i.e., d)(2)f. plus d)(2)g.), in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart U, including the following sections:

Section:	Requirement:
63.489(a)	general requirements for monitoring equipment
63.489(b)(3)	a continuous temperature monitoring device in the firebox
63.489(e)	establishment of parameter monitoring levels
63.491(b)	compliance demonstration records
63.491(c)	establishment of parameter monitoring level records
63.491(f)(2)	daily average value of the firebox temperature
63.501	maintenance wastewater requirements
63.502	equipment leak and heat exchange system provisions
63.506(a)	data retention
63.506(b)	Subpart A requirements
63.506(b)(1)(i)	records of start-up, shutdown, and malfunction
63.506(c)	application for approval of construction or reconstruction
63.506(d)	recordkeeping and documentation

e) Reporting Requirements

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

a. all days which the daily average temperature in the firebox of the thermal incinerator does not comply with the temperature limitation specified above;

b. an identification of each incident of deviation described in e)(1)a. above where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in e)(1)a. above where prompt corrective action, that would bring the daily average temperature in the firebox for the thermal incinerator into compliance with the acceptable value, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in e)(1)a. above where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit semiannual reports and other such notifications to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR Part 63, Subpart U, per the following sections:

Section:	Requirement:
63.492	Batch front-end process vents reporting requirements
63.502	equipment leak and heat exchange system provisions
63.506(b)(1)(ii)	reports of start-up, shutdown, and malfunction
63.506(e)	reporting and notification

(3) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall include the calculations of the total VOC emissions and shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitation in b)(1) above shall be determined in accordance with the following method:

a. <u>Emission Limitation:</u>

117.94 tons of VOC per year

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined by the record keeping requirements specified in d)(2) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

For each aggregate batch vent stream, reduce organic HAP emissions by 90 weight percent or to a concentration of 20 ppmv, whichever is less stringent, on a continuous basis using a control device. For purposes of complying with the 20 ppmv outlet concentration standard, the outlet concentration shall be calculated on a dry basis. When a combustion device is used for purposes of complying with the 20 ppmv outlet concentration standard, the concentration shall be corrected to 3 percent oxygen if supplemental combustion air is used to combust the emissions. If supplemental combustion air is not used, a correction to 3 percent oxygen is not required.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the allowable organic HAP emission limitation based on the results of emission testing conducted in accordance sections 63.490(e) and 63.504 of 40 CFR Part 63,Subpart U.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

85 percent overall control efficiency for OC

90 percent destruction of OC

Applicable Compliance Method:

If required, compliance with the OC emission limitations shall be determined by using Methods 1-4 and 25 or 25A of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

12. T041, AN #60

Operations, Property and/or Equipment Description:

Acrylonitrile tank #60 - 12,000 gallon horizontal storage tank

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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.	40 CFR Part 63, Subpart U	Per section 63.480(g) of 40 CFR Part 63, Subpart U, this storage vessel has been assigned to emissions unit P007. This storage vessel meets the definition of a Group 2 storage vessel.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) See c) of Section C.8 for emissions unit P007.

d) Monitoring and/or Recordkeeping Requirements

(1) See d) of Section C.8 for emissions unit P007.

e) Reporting Requirements

(1) See e) of Section C.8 for emissions unit P007.

f) Testing Requirements

(1) See f) of Section C.8 for emissions unit P007.

g) Miscellaneous Requirements

(1) None.

13. T042, AN #61

Operations, Property and/or Equipment Description:

Acrylonitrile tank #61 - 12,000 gallon fixed roof tank

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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.	40 CFR Part 63, Subpart U	Per section 63.480(g) of 40 CFR Part 63, Subpart U, this storage vessel has been assigned to emissions unit P007. This storage vessel meets the definition of a Group 2 storage vessel.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) See c) of Section C.8 for emissions unit P007.

d) Monitoring and/or Recordkeeping Requirements

(1) See d) of Section C.8 for emissions unit P007.

e) Reporting Requirements

(1) See e) of Section C.8 for emissions unit P007.

f) Testing Requirements

(1) See f) of Section C.8 for emissions unit P007.

g) Miscellaneous Requirements

(1) None.

14. T043, Styrene - #62

Operations, Property and/or Equipment Description:

Styrene tank #62 - 12,000 gallon fixed roof tank

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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.	40 CFR Part 63, Subpart U	Per section 63.480(g) of 40 CFR Part 63, Subpart U, this storage vessel has been assigned to emissions unit P007. Per section 63.484(b)(5) of 40 CFR Part 63, Subpart U, this storage vessel is specifically exempt from the requirements of sections 63.119 through 63.123 and section 63.148 of 40 CFR Part 63, Subpart G.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) See c) of Section C.8 for emissions unit P007.

d) Monitoring and/or Recordkeeping Requirements

(1) See d) of Section C.8 for emissions unit P007.

e) Reporting Requirements

(1) See e) of Section C.8 for emissions unit P007.

f) Testing Requirements

(1) See f) of Section C.8 for emissions unit P007.

g) Miscellaneous Requirements

(1) None.

15. T044, AN - #63

Operations, Property and/or Equipment Description:

Acrylonitrile tank #63 - 12,000 gallon fixed roof tank

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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.	40 CFR Part 63, Subpart U	Per section 63.480(g) of 40 CFR Part 63, Subpart U, this storage vessel has been assigned to emissions unit P007. This storage vessel meets the definition of a Group 2 storage vessel.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) See c) of Section C.8 for emissions unit P007.

d) Monitoring and/or Recordkeeping Requirements

(1) See d) of Section C.8 for emissions unit P007.

e) Reporting Requirements

(1) See e) of Section C.8 for emissions unit P007.

f) Testing Requirements

(1) See f) of Section C.8 for emissions unit P007.

g) Miscellaneous Requirements

None.