



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL  
BUTLER COUNTY  
Application No: 14-4716**

**CERTIFIED MAIL**

**DATE:** July 21, 1999

Chase Industries, Inc  
Mark Korn  
10021 Commerce Park Drive  
Cincinnati, OH 45246

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.



The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, buy it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA  
HAMILTON COUNTY DEPT. OF ENV SERVICES  
Kentucky Department of Natural Resources & Environmental Protection Ohio-Kentucky-Indiana Regional Council of Governments  
Indiana Office of Air Management

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

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**Terms and  
Conditions**

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**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 14-4716**

Application Number: 14-4716  
APS Premise Number: 1409000716  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Chase Industries, Inc  
Person to Contact: Mark Korn  
Address: 10021 Commerce Park Drive  
Cincinnati, OH 45246

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**10021 Commerce Park Drive  
Union Township, Ohio**

Description of proposed emissions unit(s):  
**OPEN AIR BRUSHING & SPRAYING OPERATION.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., 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.)

#### 3. Records Retention Requirements

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.

#### 4. 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

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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.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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).

**6. 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.

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is

made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

#### **9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

#### **10. Public Disclosure**

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

#### **11. Applicability**

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

#### **12. Best Available Technology**

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As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	28.0

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Open Air Brushing and Spraying Operation.	OAC rule 3745-31-05	For coating non-metal parts: 238.4 lbs. OC/day 19.5 TPY OC
		For coating metal parts: 34.7 lbs. VOC/day 2.84 TPY VOC
		For cleanup: 67.1 lbs. VOC/day 5.64 TPY VOC
		See Part I, Term A.7.
	OAC rule 3745-15-07	Exempt, See Term B.5.
	OAC rule 3745-21-07 (G)	
	OAC rule 3745-21-09 (U)(1)(c)	Less stringent than the limits established by OAC rule 3745-31-05.
	Synthetic Minor to avoid Title V operating permit requirements	See Terms A.2.a, B.1 - B.6.

**2. Additional Terms and Conditions**

**2.a Hazardous Air Pollutants**

Chase

PTI A<sub>1</sub>Emissions Unit ID: **K001****Date: To be entered upon final issuance**

The total allowable usage of Hazardous Air Pollutant(s) [HAP(s)], as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9\* TPY for any single HAP and 24.9\*\* TPY for any combination of HAPs. Compliance with the above HAP(s) usage limitations shall be based on a rolling, 12-month summation of the HAP(s) usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAP(s) usage limits specified in the following table:

<u>Month(s)</u>	Maximum Allowable Single HAP Usage <u>Tons</u>	Maximum Allowable Combined HAP Usage <u>Tons</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAP(s) usage limits shall be based upon a rolling, 12-month summation of the HAP(s) usage figures.

· This assumes the HAP(s) emitted are the same as the amount of HAP(s) used since all HAP(s) used evaporate.

**2.b** Compliance with OAC rule 3745-31-05 shall be demonstrated by usage and emission limits, the use of non-photochemically reactive materials and compliance with the air toxics policy.

## **B. Operational Restrictions**

**Chase**PTI A<sub>1</sub>Emissions Unit ID: **K001****Date: To be entered upon final issuance**

1. The maximum coating usage for emissions unit K001 shall not exceed 40 gallons per day and 6,545 gallons per year, including water and exempt solvents for coating non-metal parts. The annual usage limit is based upon a rolling, 12-month summation.
2. The maximum coating usage for emissions unit K001 shall not exceed 15 gallons per day and 2,460 gallons per year, excluding water and exempt solvents for coating metal parts. The annual usage limit is based upon a rolling, 12-month summation.
3. The OC content of any coating employed when coating non-metal parts in emissions unit K001 shall not exceed 5.96 pounds per gallon, as applied, including water and exempt solvents.

Emissions Unit ID: **K001**

4. The VOC content of any coating employed when coating metal parts in emissions unit K001 shall not exceed 2.31 pounds per gallon, as applied, excluding water and exempt solvents.
5. The maximum cleanup material usage for emissions unit K001 shall not exceed 10 gallons per day and 1,670 gallons per year. The annual usage limit is based upon a rolling, 12-month summation.
6. The OC content of cleanup material employed for emissions unit K001 shall not exceed 6.75 pounds per gallon.
7. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for emissions unit K001:
  - a. The name and identification number of each coating employed.
  - b. Documentation on whether or not each coating and organic cleanup material is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
  - c. The OC content of each coating for non-metal parts, in pounds per gallon, as applied, including water and exempt solvents.
  - d. The volume, in gallons, of each coating employed for coating non-metal parts, including water and exempt solvents.
  - e. The total volume, in gallons, of all coatings employed for coating non-metal parts, including water and exempt solvents.
  - f. The daily OC emissions from coating non-metal parts, calculated by taking the sum of (c) times (d) for each coating employed for coating non-metal parts.
  - g. The VOC content of each coating for metal parts, in pounds per gallon, as applied, excluding water and exempt solvents.
  - h. The volume, in gallons, of each coating employed for coating metal parts, excluding water and exempt solvents.
  - i. The total volume, in gallons, of all coatings employed for coating metal parts, excluding

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water and exempt solvents.

- j. The daily VOC emissions from coating metal parts, calculated by taking the sum of (g) times (h) for each coating employed for coating non-metal parts.
2. The permittee shall collect and record the following information for each day for the cleanup materials used in emissions unit K001:
    - a. The company identification of each cleanup material employed.
    - b. The OC content of each cleanup material employed, in pounds per gallon.
    - c. The volume, in gallons, of each cleanup material employed.
    - d. The daily OC emissions from cleanup materials employed, calculated by taking the sum of (b) times (c) for each cleanup material employed.
  3. The permittee shall collect and record the following information each month for the entire facility:
    - a. The name and identification number of each coating, employed.
    - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
    - c. The total combined HAPs content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
    - d. The number of gallons of each coating employed.
    - e. The name and identification of each cleanup material employed.
    - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
    - g. The total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)].
    - h. The number of gallons of each cleanup material employed.
    - i. The total individual HAP usage for each HAP from all coatings and cleanup materials

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employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material].

- j. The total combined HAPs usage from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
- k. The updated rolling, 12-month summation of usage for each individual HAP emissions\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- l. The updated rolling, 12-month summation of usage for total combined HAPs emissions\*\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - \* A listing of the HAP(s) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
  - \*\* This assumes the HAP(s) emitted are the same as the amount of HAP(s) used since all HAP(s) used evaporate.
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).
  - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
5. The permittee shall maintain monthly records of the updated rolling, 12-month summation for metal part coatings, non-metal part coatings and cleanup material usage.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the emissions unit exceeded any usage, OC content and/or emissions limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any monthly record showing any deviation from the following:
  - a. The total individual HAP usage limitation for each HAP from all coatings and cleanup materials employed, in tons per month and tons per rolling, 12-month period.
  - b. The total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and tons per rolling 12-month period.

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4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit.
5. The permittee shall submit reports which identify the updated rolling, 12-month summation for each month of the amount of coatings employed for metal and non-metal parts and cleanup material

**E. Testing Requirements**

1. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. Compliance with the emissions limits cited in Term A.1 shall be demonstrated by the record keeping in Term C.1.
3. Compliance with the usage limits cited in Terms B.1, B.2 and B.5 shall be demonstrated by the record keeping in Terms C.1, C.2 and C.5.
4. Compliance with the OC/VOC content limits cited in Terms B.3, B.4 and B.6 shall be demonstrated by the record keeping in Term C.1 and C.2.
5. Compliance with the HAP(s) emission limitations in Term A.2.a shall be demonstrated by the record keeping in Term C.3.

**F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to

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the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant 1: Stoddard Solvent

TLV (ug/m3): 573,000

Maximum Hourly Emission Rate (lbs/hr): 6.71

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1124.0

MAGLC (ug/m3): 13643

Pollutant 2: Heptane

TLV (ug/m3): 1,639,000

Maximum Hourly Emission Rate (lbs/hr): 15.44

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 2586

MAGLC (ug/m3): 39,024

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;

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- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

- 2. The preceding terms and conditions in Parts A thru F shall supersede all the air pollution control requirements for emissions unit K001 contained in the permit to install application number 14-2768 as issued on December 21, 1992.