



State of Ohio Environmental Protection Agency

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50 W. Town St., Suite 700  
Columbus, Ohio 43215

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

12/4/2008

Dale Foster  
Alcoa, Inc.  
200 3rd Avenue  
Carnegie, PA 15106

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0575010251  
Permit Number: P0104175  
Permit Type: Administrative Modification  
County: Shelby

Certified Mail

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

Dear Permit Holder:

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

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

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

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

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

Sincerely,

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

Cc: Ohio EPA-SWDO

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





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

**FINAL**

**Air Pollution Permit-to-Install and Operate  
for  
Alcoa, Inc.**

Facility ID: 0575010251  
Permit Number: P0104175  
Permit Type: Administrative Modification  
Issued: 12/4/2008  
Effective: 12/4/2008  
Expiration: 9/25/2018





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Permit-to-Install and Operate**  
for  
Alcoa, Inc.

**Table of Contents**

Authorization ..... 1

A. Standard Terms and Conditions ..... 3

    1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4

    2. Who is responsible for complying with this permit? ..... 4

    3. What records must I keep under this permit? ..... 4

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

    5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4

    6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5

    7. What reports must I submit under this permit? ..... 5

    8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? ..... 5

    9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?... 5

    10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 6

    11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6

    12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6

    13. Can I transfer this permit to a new owner or operator? ..... 6

    14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 7

    15. What happens if a portion of this permit is determined to be invalid? ..... 7

B. Facility-Wide Terms and Conditions..... 8

C. Emissions Unit Terms and Conditions ..... 10

    1. P003, High Vacuum System.....11





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0104175  
**Facility ID:** 0575010251  
**Effective Date:** 12/4/2008

# Authorization

Facility ID: 0575010251  
Application Number(s): M0000335  
Permit Number: P0104175  
Permit Description: Adm. Mod. to address monitoring and reporting requirements on the adsorber.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 12/4/2008  
Effective Date: 12/4/2008  
Expiration Date: 9/25/2018  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Alcoa, Inc.  
1501 West Michigan St.  
Sidney, OH 45365

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

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

Ohio EPA DAPC, Southwest District Office  
401 East Fifth Street  
Dayton, OH 45402  
(937)285-6357

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0104175  
**Facility ID:** 0575010251  
**Effective Date:** 12/4/2008

## Authorization (continued)

Permit Number: P0104175  
Permit Description: Adm. Mod. to address monitoring and reporting requirements on the adsorber.

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

|                                   |                    |
|-----------------------------------|--------------------|
| <b>Emissions Unit ID:</b>         | <b>P003</b>        |
| Company Equipment ID:             | High Vacuum System |
| Superseded Permit Number:         |                    |
| General Permit Category and Type: | Not Applicable     |



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104175

**Facility ID:** 0575010251

**Effective Date:** 12/4/2008

## **A. Standard Terms and Conditions**



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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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



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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

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

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

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

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

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

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

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

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

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

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

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## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
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**Final Permit-to-Install and Operate**

**Permit Number:** P0104175

**Facility ID:** 0575010251

**Effective Date:** 12/4/2008

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104175

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**Effective Date:** 12/4/2008

## **C. Emissions Unit Terms and Conditions**



**1. P003, High Vacuum System**

**Operations, Property and/or Equipment Description:**

Recovery wells, 1-knock-out tank, one 10 HP liquid ring vacuum pump, one activated carbon absorber, and discharge stack

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) b)(1)c, and d)(3).

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(D)        | The emissions of Organic Compounds (OC's), Volatile Organic Compounds (VOC) and/or hazardous air pollutants (HAP's), shall not exceed 1.4 tons per year.<br><br>b)(2)a, c)(1), d)(2), e)(1), and f)(1)a, below                                                                                     |
| b. | OAC rule 3745-21-07(G)(2)     | When processing OC materials that are or contains photochemically reactive liquid organic, the OC emissions from this operation shall be less than 8 pounds per hour, and 40 pounds per day, or be reduced by at least 85 percent by weight.<br><br>b)(2)b., c)(1), d)(1), e)(2), and f)(2), below |
| c. | OAC rule 3745-114-01          | Ohio Toxic Rule<br><br>d)(3)                                                                                                                                                                                                                                                                       |

(2) Additional Terms and Conditions

a. The 1.4 tons of Organic Compounds (OC's), Volatile Organic Compounds (VOC) and/or hazardous air pollutants (HAP's) limitation is established to reflect the potential to emit for this emissions unit. The annual limit is based on the use of a carbon absorber with at least 85% control efficiency and a controlled potential hourly emission rate of 0.32 pounds per hour.



- b. On February 18, 2008, OAC rule 3745-21-07 was revised to delete paragraph (G); therefore, paragraph (G) is no longer part of the State regulations. However, that rule revision has not been approved by the U.S.EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs to OAC rule 3745-21-07, the requirement of the previous OAC rule 3745-21-07(G) still exists as part of the federally approved SIP for Ohio.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the terms and conditions within this permit which are required by previous OAC rule 3745-21-07(G) will not be required and will not be federally and/or state enforceable.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the permittee shall take immediate steps to assure compliance with any and all requirements of the revised OAC rule and/or SIP.

- c. All of the VOC emissions from this emissions unit shall be vented to a carbon adsorber that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

[OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

- (1) All of the Organic Compounds (OC's), Volatile Organic Compounds (VOC) and/or hazardous air pollutants (HAP's) emissions from this emissions unit shall be vented to an absorber that has a designed control efficiency of at least 85 percent by weight and shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) This facility shall maintain the following daily records if any material processed is by definition photo chemically reactive material "PRM" or contains a substance that is by definition "PRM" during any time when the organic compound (OC) emissions are not being vented to the control device:
  - a. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the amount of each "PRM" material or "PRM" containing material employed while coating non-metal parts, in gallons;
  - b. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the organic compound content of each "PRM" material or "PRM" containing material employed while coating non-metal parts, in lbs/gal;
  - c. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the organic compound (OC) emissions of each "PRM" material or "PRM" containing material employed while coating non-metal parts, in lbs of OC/day ("a" x "b");



- d. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the total number of hours this emission unit was used to coat non-metal parts, in hours/day; and
  - e. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the estimated hourly OC emission rate while coating non-metal parts, in lbs of OC/hr ("c"/"d").
- (2) The permittee shall properly install, operate, and maintain a continuous organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the carbon adsorber when the emissions unit is in operation. The monitoring and recording devices shall be capable of accurately measuring the VOC concentration. The organic monitoring device and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the carbon adsorber was/were in operation, during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
  - b. a log of the downtime for the capture (collection) system, carbon adsorber, and monitoring equipment when the associated emissions unit(s) was/were in operation.

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

[OAC rule 3745-77-07(C)(1)]

- (3) Whenever the monitored average VOC concentration of the exhaust gases from the condenser deviates from the limit/range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.

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



- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the VOC concentration of the exhaust gases from the condenser immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (4) Modeling to demonstrate compliance with, the A Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit=s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the carbon adsorber during the operation of the emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average VOC concentration of the exhaust gases from the carbon adsorber was outside of the range specified by the manufacturer and/or outside of the established limit;
  - b. each period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the carbon adsorber;
  - c. an identification of each incident of deviation described in Aa or "b" (above) where a prompt investigation was not conducted;
  - d. an identification of each incident of deviation described in Aa or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the VOC concentration of the exhaust gases into compliance with the acceptable limit, was determined to be necessary and was not taken; and



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

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period. The quarterly deviation report and the quarterly summary reports can be submitted as one report if the information required by both reports is included and identified in the submission.

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

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit deviation (excursion) reports for that identify each exceedance of the following when the emissions unit is emitted OC emissions without the use of the control device:
  - a. the average hourly OC emissions exceed 8 pounds from the use of defined "PRM" or contains a substance that is by definition "PRM" materials;and/or
  - b. the daily OC emissions exceed 40 pounds from the use of defined "PRM" or contains a substance that is by definition "PRM" materials.

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.

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

f) Testing Requirements

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

- a. Emission Limitation

1.4 tons of OC, VOC, and/or HAP(s) per year

The allowable emissions rates are based upon the following equation:

Overall Uncontrolled OC emissions, in pounds, based on the following formula:

$$OCc = [(Cc / 1,000,000) \times [(Af) \times 60 \text{ min/hr}] \times (Mw/28.97)] \times (100\% \text{ emitted} - Ce)$$

Where:

OCc = Controlled OC hourly emissions, in pounds;

Cc = Total OC concentration, in ppmv, (2610.95 ppmv based on permit application calculation sheet);

Af = Mass air flow, pounds per hour, (3.43 lbs/min.);



Mw = Volume weighted Molecular weight, in grams/mole, (114.53 g/mol based on permit application calculation sheet); and

Ce = Control efficiency of the condenser, (assumed to be 85%, from Permit Application).

The annual allowable is based on the hourly potential multiplied by 8760 hours of operation per year and then divided by 2000 pounds per ton.

**Applicable Compliance Method:**

Compliance is based on the information provided in the permit application by the permittee. If the information that was provided by the permittee in establishing these estimated potential/allowable emissions change and/or updated in a manner that will increase the calculated emissions, the permittee shall apply for and obtain a new permit to address these emission increases.

If requested, the permittee shall determine the OC, VOC and/or HAP content of the material being processed by the use formulation data or USEPA Method 24.

- (2) Compliance with the emission limitations specified by the SIP and the previous OAC rule 3745-21-07(G)(2) in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

- i. The OC emissions from the use photochemically reactive liquid organic materials or substance containing photochemically reactive material shall not exceed 8 pounds per hour nor 40 pounds per day, while coating non-metal parts; or
- ii. The OC emissions are reduced by at least 85% by weight.

**Applicable Compliance Method:**

Compliance with the above OC emission limitations shall be determined by the recordkeeping requirement specified in Section d)(1) and d)(2).

If requested, the permittee shall demonstrate compliance with the OC emission limitations and/or carbon absorber control efficiency requirement based upon the results of emission testing conducted in accordance with OC: Methods 1-4, and 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- g) Miscellaneous Requirements

- (1) None.