State of Ohio Environmental Protection Agency

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

Certified Mail

3/10/2009

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

Teresa Turnbow
Patheon Pharmaceuticals Inc.
2110 EAST GALBRAITH RD
Cincinnati, OH 45237

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431380503
Permit Number: P0104535
Permit Type: Renewal
County: Hamilton

Dear Permit Holder:

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

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

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

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

If you have any questions regarding this permit, please contact the Hamilton County Dept. of Environmental Services. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

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

Cc: HCDOES

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install and Operate
for
Patheon Pharmaceuticals Inc.

Facility ID: 1431380503
Permit Number: P0104535
Permit Type: Renewal
Issued: 3/10/2009
Effective: 3/10/2009
Expiration: 3/10/2014

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Patheon Pharmaceuticals Inc.

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Authorization

Facility ID: 1431380503
Application Number(s): A0036624
Permit Number: P0104535
Permit Description: Intermediate Scale Pharmaceutical Suite
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 3/10/2009
Effective Date: 3/10/2009
Expiration Date: 3/10/2014
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

Patheon Pharmaceuticals Inc.
2110 East Galbraith Rd
Cincinnati, OH 45237

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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0104535
Permit Description: Intermediate Scale Pharmaceutical Suite

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

Emissions Unit ID:	**P051**
Company Equipment ID:	ISPS
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units B003 (72.6 MMBtu/hr Natural Gas / No. 2 Fuel Oil Fired Boiler), P002 (capsule production line), P003 (Tablet coating line), P004 (Tablet coating line), P005 (Tablet coating line), P006 (Tablet coating line) P007 (fluid bed dryer), P008 (dry products line), P010 (dry packaging), P012 (lozenge manufacturing), P014 (granulation processing), P044-P047 (drying ovens), P048 (Tablet coating line), P051 (Intermediate Scale Processing Suite for pharmaceutical products), any de minimis emissions units as defined in OAC rule 3745-15-05, and any registration status and/or permit exempt emissions units shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

      The permittee has existing records to demonstrate compliance with the limitations in B.1.b)(1) upon permit issuance.

      (2) The permittee shall collect and record the following information each month for emissions units B003 (72.6 MMBtu/hr Natural Gas / No. 2 Fuel Oil Fired Boiler), P002 (capsule production line), P003 (Tablet coating line), P004 (Tablet coating line), P005 (Tablet coating line), P006 (Tablet coating line) P007 (fluid bed dryer), P008 (dry products line), P010 (dry packaging), P012 (lozenge manufacturing), P014 (granulation processing), P044-P047 (drying ovens), P048 (Tablet coating line), P051 (Intermediate Scale Processing Suite for pharmaceutical products), and any de minimis defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units:

         a. The name and identification number of each coating or solvent employed;

         b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating or solvent in pounds of individual HAP per pound of coating or solvent, as applied;

         c. The total combined HAP content of each coating or solvent in pounds of combined HAPs per pound of coating or solvent, as applied [sum all the individual HAP contents from (b)];

         d. The number of pounds of each coating or solvent 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 HAP 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 emissions for each HAP from all coatings (or solvents) and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) times the emissions factor (if applicable) for each coating or solvent plus the sum of (f) times (h) for each cleanup material plus individual HAP emissions from any de minimis, registration status and/or permit exempt emissions unit at the facility];

j. The total combined HAP emissions from all coatings (or solvents) and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) times the emissions factor (if applicable) for each coating or solvent plus the sum of (g) times (h) for each cleanup material plus combined HAP emissions from any de minimis, registration status and/or permit exempt emissions unit at the facility];

k. The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

l. The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Hamilton County Department of Environmental Services. This information does not have to be kept on an individual emissions unit basis.

(3) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any exceedance of the HAP emissions limitations outlined in B.1.b)(1). If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

(4) Emission limitation:

The total allowable emissions of Hazardous Air Pollutants (HAPs) from the emissions units identified in Section B.1.b)(1) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be based on the record keeping requirements established in Section B.1.b)(2).

C. Emissions Unit Terms and Conditions

1. P051, ISPS

Operations, Property and/or Equipment Description:

Intermediate Scale Processing Suite for pharmaceutical products

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

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

a. d)(3), d)(4), d)(5), d)(6) and e)(3).

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

a. b)(2)d., d)(1) and e)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(b)	See b)(2)c.
b.	OAC rule 3745-31-05(A)(3)	Emissions of Organic Compounds (OC) shall not exceed 1.82 lb/hour (not including clean up). See b)(2)b. The requirements for this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-17-11	Particulate Emissions (PE) shall not exceed 0.80 lb/hr.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-31-05(D)(1)(b)	See b)(2)d. and Section B.1.b)(1) through

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(Synthetic minor to avoid title V permitting)	Section B.1.b)(4).
	OAC rule 3745-31-05(D)(1)(b) (Synthetic minor to avoid Major NSR permitting)	See term and condition b)(2)d.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by emission limitations and the use of a thermal oxidizer with an overall OC control efficiency of at least 98 percent by weight.

b. The permittee shall control organic compound emissions from the fluid bed dryer of this emissions unit by use of a thermal oxidizer with a minimum overall OC control efficiency of 98% by weight. This requirement shall apply whenever the permittee is using OC-containing solvents.

c. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions and particulate matter emissions 10 microns and less in diameter (PM10) from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limitation of 2.0 lbs/hr as derived from OAC 3745-17-11, and the uncontrolled potential to emit for PM10 is less than ten tons per year.

d. The actual emissions of Organic Compounds (OC) from emission unit P051 shall not exceed 8.0 tons per year (including clean up). Compliance with this limitation shall be based on a rolling, 12-month summation.

c) Operational Restrictions

(1) Except when employing only non-OC containing solvents, all of the OC emissions from the fluid bed dryer of this emissions unit shall be vented to the thermal oxidizer when in operation.

d) Monitoring and/or Recordkeeping Requirements

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

a. the company identification of each coating/solvent and cleanup material employed in these emissions units;

b. the amount of OC materials employed, in pounds per month;

c. the organic compound emissions, in tons per month;

d. the updated, rolling 12-month summation of the OC usage rate for emission unit P051. This shall include the information for the current month and the preceding eleven months; and

e. the updated, rolling 12-month summation of the OC emissions for emission unit P051, in tons. This shall include the information for the current month and the preceding eleven months.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the average combustion temperature within the thermal oxidizer 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 temperature on a continuous basis.

Whenever the monitored value for the average combustion temperature within the thermal oxidizer 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 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 average combustion temperature within the thermal oxidizer 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 values for the average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall be maintained above 1550 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

These 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 organic compound emission tests that demonstrate compliance with the allowable organic compound emission rate 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 an administrative modification.

(3) The FEPTIO application for this emissions unit, P051, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The AToxic Air Contaminant Statute@, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled AReview of New Sources of Air Toxic Emissions, Option A@, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices@; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices@; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., A**X**@ hours per day and A**Y**@ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or Aworst case@ toxic contaminant(s):

Toxic Contaminant: methanol

TLV (mg/m3): 262,086

Maximum Hourly Emission Rate (lbs/hr): 1.82

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 138.6

MAGLC (ug/m3): 6240

The permittee, has demonstrated that emissions of methanol, from emissions unit P051 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F).

(4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration@, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AToxic Air Contaminant Statute@ will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration

e) Reporting Requirements

(1) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any exceedance of the OC emissions limitation outlined in b)(2)d. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the emissions limitation(s) specified in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation:

Particulate Emissions (PE) shall not exceed 0.80 lb/hr.

Applicable Compliance Method:

The hourly PE limitation is based on Table I in OAC rule 3745-17-11(B). This emission limitation exceeds the emission unit's controlled potential to emit. Compliance with the emission limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application 14-06009 submitted December 13, 2007. The controlled potential to emit was calculated by: [(solids usage in lbs/hr) x (granulation solids lost at mixer(%)) + (solids usage in lbs/hr)x (granulation solids lost at FBD(%)) x (1- cartridge filter efficiency (99.97))] + [(solids usage in lbs/hr) x (granulation solids lost at dry mill(%) x (1- HEPA filter efficiency (99.97))]

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 5 of 40 CFR, Part 60, Appendix A for particulate emissions (PE).

b. Emission Limitation:

Particulate emissions (PE) and particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 10.0 TPY.

Applicable Compliance Method:

The emission limitations exceed the emission unit's potential to emit. The uncontrolled potential to emit was calculated by: (solids usage in lbs/hr) x [(granulation solids lost at mixer(%))+(granulation solids lost at FBD(%))+ (granulation solids lost at dry mill(%)] x 7786 operating hours/yr /2000 pounds per ton. All PE is assumed to be PM10.

c. Emission Limitation:

Visible particulate emissions shall not exceed 20% 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 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

d. Emission Limitations:

1.82 lbs of OC/hour and 8.0 TPY OC

Applicable Compliance Method:

The hourly OC emissions rate shall be determined by multiplying the maximum OC throughput (pounds of OC per batch divided by the hours per batch) multiplied by 1 minus the capture efficiency of the system (99.8) for the amount of fugitive emissions added to the quantity of the maximum OC throughput (pounds of OC per batch divided by the hours per batch) multiplied by the capture efficiency of the system (99.8) multiplied by the control efficiency of the thermal oxidizer (1- 0.98), as provided in PTI application 14-06009 submitted on

December 12, 2007. The annual OC emissions shall be reported to the Hamilton County Department of Environmental Services and determined by multiplying the amount of OC material employed per month over the preceding 12 month period multiplied by 1 minus the capture efficiency of the system (99.8) for the amount of fugitive emissions added to the quantity of the maximum OC throughput (pounds of OC per batch divided by the hours per batch) multiplied by the capture efficiency of the system (99.8) multiplied by the control efficiency of the thermal oxidizer (1- 0.98) and adding in the cleanup solvent usage and dividing the sum by 2000 lbs/ton to obtain tons OC per year.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A for OC emissions.

g) Miscellaneous Requirements

(1) None.