State of Ohio Environmental Protection Agency

STREET ADDRESS:
Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

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MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

6/18/2009

Certified Mail
Facility ID: 0247040822
Permit Number: P0085332
County: Lorain

Randy Miller
3M Elyria
1301 Lowell st.
Elyria, OH 44035-4864

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The issuance of this Title V permit 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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northeast District Office

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Title V Permit to Control Air Pollution
OAC Chapter 3745-77

3M Elyria

Facility ID: 0247040822
Permit Number: P0085332
Permit Type: Renewal
Issued: 6/18/2009
Effective: 7/9/2009
Expiration: 7/9/2014

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Title V Permit to Control Air Pollution
OAC Chapter 3745-77
3M Elyria

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Authorization

Facility ID: 0247040822
Facility Description: Synthetic Sponge manufacturing
Application Number(s): A0015978, A0015979, A0015980
Permit Number: P0085332
Permit Description: TV renewal
Permit Type: Renewal
Issue Date: 6/18/2009
Effective Date: 7/9/2009
Expiration Date: 7/9/2014
Superseded Permit Number:

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

3M Elyria
1301 Lowell st.
Elyria, OH 44035-4864

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

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

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

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

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northeast District Office.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

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

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

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

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

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

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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

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

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

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

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

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

10. Reasonably Anticipated Operating Scenarios

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

11. Reopening for Cause

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

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

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

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

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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

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

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

(2) Compliance certifications shall include the following:

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

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

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

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

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

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

17. Off-Permit Changes

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

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

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

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

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

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

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

18. Compliance Method Requirements

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

19. Insignificant Activities or Emissions Levels

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

20. Permit to Install Requirement

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

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

23. Title VI Provisions

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

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

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

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

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

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

The permittee shall submit required reports in the following manner:

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

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

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

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

27. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

B. Facility-Wide Terms and Conditions

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

   a) B.11 through B.15 and B.16.

2. The following insignificant emissions units are located at the facility:

   B001 - 4.0 mmBtu/hour gas-fired boiler - Boiler #1 (PTI# 02-4768);
   B002 - 4.0 mmBtu/hour gas-fired boiler - Boiler #2 (PTI# 02-4768);
   T001 - 23,500 gallon storage tank containing carbon disulfide (PTI# 02-16640); and
   T002 - 23,500-gallon storage tank containing carbon disulfide (PTI# 02-16640).

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

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

   B003 - 4.0 MM Btu/hour gas-fired boiler. Boiler #3;
   T003 - 8,000-gallon storage tank containing 15% sodium hypochlorite;
   T004 - 6,000-gallon storage tank containing 93% sulfuric acid;
   T005 - 6,000-gallon storage tank containing fungicide;
   T006 - 10,000-gallon storage tank containing magnesium chloride;
   T007 - 10,000-gallon storage tank containing magnesium chloride;
   T008 - 6,000-gallon storage tank containing 50% hydrogen peroxide;
   T009 - 16,000-gallon storage tank containing 50% NaOH; and
   T010 - 16,000-gallon storage tank containing 50% NaOH.

4. <u>Ohio Best Available Technology (BAT) Appicable Emissions Limtations/Control Measures</u> –

   a) Combined organic compound (OC) emissions from P001-P005 and P007-P010 shall not exceed 50.8 pounds per hour and 222.5 tons per year. See 10.b) and 10.c).

      [OAC rule 3745-31-05(A)(3) and PTI 02-18240]

   b) Combined hydrogen sulfide (H_2S) emissions from P003, P004, P005, P007 and P010 shall not exceed 2.27 pounds per hour and 9.95 tons per year. See 10.d) and 10.e).

      [OAC rule 3745-31-05(A)(3) and PTI 02-18240]

   c) The biofiltration system(s), which control(s) emissions from any one or any combination of the following emissions units P001 - P005 and P007 - P010, shall remove a minimum of 80 percent (%) of OC emissions vented to it. This removal efficiency shall be determined based on the arithmatic average of the preceding sixty (60) consecutive days' average removal efficiency. See 10.f).

      [OAC rule 3745-31-05(A)(3) and PTI 02-18240]

d) The inlet to the biofiltration units shall capture a minimum of 85 percent (%) of emissions of OC and hydrogen sulfide from any one or any combination of the following emissions units P001 - P005 and P007 - P010. This capture efficiency shall be determined by monitoring the inlet concentrations of OC and hydrogen sulfide to the biofiltration units and the inlet concentrations of OC and hydrogen sulfide to the plant ventilation stack. See 10.g).

[OAC rule 3745-31-05(A)(3) and PTI 02-18240]

e) While this emissions unit is in operation, a negative pressure shall be maintained within the manufacturing area of the facility which contains the emissions units. See 10.h.

[OAC rule 3745-31-05(A)(3) and PTI 02-18240]

5. MACT Rule(s) Applicability - The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart UUUU: P001, P002, P003, P004, P005, P007, P008, P009, P010, T001 and T002. The complete Maximum Achievable Control Technology (MACT) requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Ohio EPA, Northeast District office.

6. MACT Rule(s) Applicable Emissions Limitations/Control Measures –

a) The permittee shall comply with the applicable emissions limit(s) and work practice standard(s) in Table 1 to 40 CFR, Part 63, Subpart UUUU.

(1) The sum of all uncontrolled sulfide emissions (reported as carbon disulfide) shall be reduced by at least 75 percent (%) based on a six-month rolling average.

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(A)(1), and 40 CFR, Part 63, Subpart UUUU]

(2) For each vent stream that is controlled using a control device, each stream shall be routed through a closed-vent system to the control device.

a. The work practice standards for closed vent systems shall be met by operating the closed-loop system.

b. The permittee shall inspect annually, repair leaks, and maintain records of all closed-vent systems used to route emissions to a control device, as specified in 40 CFR 63.148 or an alternative operating parameter as established and approved by U.S. EPA, according to procedures specified in Table 2.

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(A)(1), and 40 CFR, Part 63, Subpart UUUU]

(3) All closed-vent systems containing a bypass line that is able to divert a vent stream away from a control device, except for equipment needed for safety purposes describe in 40 CFR 63.148(f)(3), shall operate a flow indicator as specified in 40 CFR 63.148(f) or; shall secure the bypass line valve in the closed position with a car-seal or lock-and-key type configuration and inspect the seal or closure mechanism at least once per month as specified in 40 CFR 63.148(f)(2).

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(A)(1), and 40 CFR, Part 63, Subpart UUUU]

b) The permittee shall comply with the applicable operating limit(s) in Table 2 to 40 CFR, Part 63, Subpart UUUU. See 7.a) through 7.e).

[Authority for term: OAC rule 3745-77-07(A)(1), and 40 CFR, Part 63, Subpart UUUU]

c) As provided in 40 CFR 63.6(g), the permittee may apply to U.S. EPA for permission to use an alternative to the work practice standards in 40 CFR, Part 63, Subpart UUUU.

[Authority for term: OAC rule 3745-77-07(A)(1), and 40 CFR, Part 63, Subpart UUUU]

d) Opening of a safety device, as defined in 40 CFR 63.5610, is allowed at any time that conditions require venting to avoid unsafe condtions.

[Authority for term: OAC rule 3745-77-07(A)(1), and 40 CFR, Part 63, Subpart UUUU]

e) The emissions limits in Table 1 to 40 CFR, Part 63, Subpart UUUU used to control emissions from storage vessels do not apply during periods of planned routine maintenance. Periods of planned routine maintenance of each control device, during which the control device does not meet the applicable emissions limit, specified in Table 1 to 40 CFR, Part 63, Subpart UUUU, must not exceed 240 hours per year.

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(A)(1), and 40 CFR, Part 63, Subpart UUUU]

f) The permittee shall remain in compliance with the emissions limits, operating limits, and work practice standards in 40 CFR, Part 63, Subpart UUUU at all times, except during startup, shutdown, and malfunctions.

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(A)(1), and 40 CFR, Part 63, Subpart UUUU]

g) The permittee must always operate and maintain the affected emissions units, including any air pollution control and monitoring equipment, according to provisions in 40 CFR 63.6(e)(1)(i) and maintain a log, detailing the operation and maintenance of any control technique used for compliance with 40 CFR, Part 63, Subpart UUUU, as specified in 40 CFR 63.5515(b)(1).

[Authority for term: OAC rule 3745-77-07(A)(1), and 40 CFR, Part 63, Subpart UUUU]

h) The permittee must develop and implement a written startup, shutdown, and malfunction plan (SSMP) according to the provisions in 40 CFR 63.6(e)(3).

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(A)(1), and 40 CFR, Part 63, Subpart UUUU]

7. Ohio BAT and MACT Operational Restrictions –

a) The permittee shall maintain the following biofilter operating parameters on an average daily basis:

(1) The daily average gas temperature at the inlet of the biofiltration system shall not be more than 50 degrees Centigrade.

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(A)(1), and 40 CFR, Part 63, Subpart UUUU]

(2) The daily average biofilter effluent pH shall be maintained within the operating value(s) established during the most recent performance test that demonstrated the emissions unit(s) were in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart UUUU]

(3) The daily average pressure drop across the biofiltration system shall be maintained within the range of 0.5 to 15.0 inches of water.

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(A)(1), and 40 CFR, Part 63, Subpart UUUU]

(4) The daily average conductivity of the discharge liquor shall not exceed 200 millisiemens, to ensure the sulfate concentration of each biofiltration systems discharge liquor remains below 5 percent (%).

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(A)(1)]

b) The permittee shall maintain the following backup caustic scrubber operating parameters on an average daily basis for each day the permittee operates this piece of control equipment to demonstrate compliance with an applicable emission standard: The daily average pH of the back-up scrubber liquor, when operating, shall be maintained above 10.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(A)(1)]

c) For any of the control techniques specified in Table 2 to 40 CFR, Part 63, Subpart UUUU, an alternative operating parameter may be established and approved according to procedures specified in Table 2. Table 2 requirements for a caustic scrubber are only applicable when the permittee operates this piece of control equipment to demonstrate compliance with an applicable emission standard).

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart UUUU]

d) For any alternative control technique(s) not specified in Table 2 to 40 CFR, Part 63, Subpart UUUU, an alternative control technique may be approved according to procedures specified in Table 2.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart UUUU]

8. Ohio BAT and MACT Monitoring and/or Record Keeping Requirements –

a) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-18240, issued on 12/26/03: b) through h). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

b) The permittee shall properly install, operate, and maintain equipment to monitor the identified parameters of the biofilter system(s) during operation of any one or any combination of the following emissions units P001 - P005 and P007 - P010, including periods of startup, shutdown and malfunction. 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 following biofilter operating parameters on an average daily basis:

(1) the biofilter inlet gas temperature;

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

(2) the biofilter effluent pH;

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart UUUU]

(3) the pressure drop;

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

(4) the conductivity of the discharge liquor; and

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

(5) The permittee shall maintain a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions units.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

c) The permittee shall properly operate and maintain equipment to monitor the identified parameter(s) of the backup caustic scrubber during operation of any one or any combination of the following emissions units P001 - P005 and P007 - P010, including periods of startup, shutdown and malfunction. 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 following backup caustic scrubber operating parameters on an average daily basis. This requirement is only applicable to the caustic scrubber during periods where the permittee operates the caustic scrubber to demonstrate compliance with an applicable emission standard.

(1) The pH of the scrubber liquor;

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(A)(1)]

(2) The permittee shall maintain a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions units.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

d) Continuous Monitoring System (CMS) requirements must be maintained as follows:

(1) The permittee shall maintain a log or record of operating time for the capture (collection) system, control device(s), monitoring equipment, and identify the operating time(s) of each of the associated emissions unit(s).

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

(2) For each continuous monitoring system (CMS), a site-specific monitoring plan must be developed in accordance with the provisions in 40 CFR 63.5545(a)(1) through (3).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart UUUU]

(3) Each CMS site-specific monitoring plan must also address the provisions in 40 CFR 63.5545(b)(1) through (3).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart UUUU]

(4) A performance evaluation of each CMS must be conducted in accordance with the site specific monitoring plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart UUUU]

(5) Each CMS must be maintained in continuous operation according to the site-specific monitoring plan.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart UUUU]

(6) Each continuous parameter monitoring system (CPMS) must meet the requirements of 40 CFR 63.5545(f)(1) through (9).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart UUUU]

(7) If flow to a control device could be intermittent, a flow indicator at the inlet or outlet of the control device must be installed, calibrated and operated to identify periods of no flow.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart UUUU]

e) Emissions Monitoring System requirements must be maintained as follows:

(1) The permittee shall determine an average daily removal efficiency for the air pollution control system(s) (i.e., biofiltration unit and backup scrubber) for OC and hydrogen sulfide. The inlet to and outlet from the biofiltration system shall be monitored, at least once per shift, while any one or any combination of the following emissions units P001 -

P005 and P007 - P010 is operating, using a gas chromatograph. The daily removal efficiency shall be based on a minimum of three sets of samples. This requirement is only applicable to the caustic scrubber during periods where the permitte operates the caustic scrubber to demonstrate compliance with an applicable emission standard.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall determine average daily emissions from the plant ventilation stack for OC and hydrogen sulfide. The plant ventilation stack shall be monitored, at least once per shift, while any one or any combination of the following emissions units P001 - P005 and P007 - P010 is operating, gathering three sets of samples, and within one hour of monitoring the biofiltration stack, using a gas chromatograph. This daily average shall be based on a minimum of three sets of samples.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

(3) In order to demonstrate continuous compliance with the sulfide emissions (as carbon disulfide) removal efficiency, in percent, as a 6-month rolling average emissions limit, specified in 6.(a)(1), the permittee shall maintain a material balance that includes the pertinent data used to determine the percent reduction of total sulfide emissions. The permittee shall document the percent reduction of total sulfide emissions using the pertinent data from the material balance.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR, Part 63, Subpart UUUU]

f) Closed vent system requirements must be maintained as follows:

(1) The permittee shall ensure, once per shift, that the manufacturing area of emissions units P001 - P005 and P007 - P010 is maintained under negative pressure, in accordance with the procedure specified in 10.h.

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

(2) The permittee shall inspect, repair leaks, and maintain records annually for all closed-vent systems used to route emissions to a control device or maintain documentation as specified in an alternative operating parameter plan as may be established and approved by U.S. EPA according to procedures specified in Table 2.

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

g) General Monitoring Data Collection requirements shall be maintained as follows:

(1) During start-up, shutdown and malfunctions, deviations are not violations as long as the permittee can demonstrate operation according to 40 CFR 63.6(e).

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

(2) Monitoring data shall be collected in accordance with 40 CFR 63.5560.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart UUUU]

h) The permittee shall maintain records, that are easily accessible, of the following for at least five (5) years:

(1) each notification and report that is submitted;

(2) all records related to start-up, shutdown, and malfunctions;

(3) site-specific monitoring plan;

(4) records of performance tests;

(5) nitrogen unloading and storage systems;

(6) records of material balances;

(7) records of calculations;

(8) control device maintenance records; and

(9) safety device records.

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

9. Ohio BAT and MACT Reporting Requirements –

a) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 02-18240, issued on 12/26/03: b) through f). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

b) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the biofilter system(s) during the operation of any one or any combination of the following emissions units P001 - P005 and P007 - P010:

(1) each period of time when the average inlet temperature to the biofiltration system exceeded the temperature restriction specified in 7.a).

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart UUUU]

(2) each period of time when the biofilter effluent pH was outside the appropriate range specified in 7.a).

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

(3) each period of time when the pressure drop across the biofiltration system(s) was outside the range specified in 7.a).

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

(4) each period of time when the sulfate concentration of the biofiltration system's discharge liquor exceeded the requirements specified in 7.a).

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

c) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the backup caustic scrubber during the operation of any one or any combination of the following emissions units P001 - P005 and P007 - P010: Each period of time when the pH of the back-up scrubber liquor was outside the requirement specified in 7.b). This requirement is only applicable to the caustic scrubber during periods where the permitte operates the caustic scrubber to demonstrate compliance with an applicable emission standard.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(A)(1)]

d) The permittee shall submit quarterly deviation (excursion) reports regarding the OC capture and control systems requirements for emissions units P001-P005 and P007-P010 and the OC monitoring system. The report shall include the following information:

(1) each day when the average OC removal efficiency from the biofiltration system was less than 80 percent (%) and the actual average OC removal efficiency for each such day;

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

(2) each day when the average OC capture efficiency of the biofiltration system was less than 85 percent (%) and the actual average OC capture efficiency;

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

(3) the commencement and completion times, and duration of exceedance;

(4) the reason for the deviation(s) (if known); and

(5) the corrective actions taken (if any) for each exceedance.

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

e) The permittee shall submit quarterly deviation (excursion) reports regarding the sulfide emissions (as carbon disulfide) control systems requirements for emissions units P001-P005 and P007-P010 and the sulfide emissions monitoring system as specified in Table 8 to 40 CFR Subpart UUUU, The report shall include the following information:

(1) each month when the average sulfide emissions (as carbon disulfide) removal efficiency from the biofiltration system was less than 75 percent (%), as a 6-month rolling average and the actual average sulfide removal efficiency for each such month;

(2) the commencement and completion times, and duration of exceedance;

(3) the reason for the deviation(s) (if known); and

(4) the corrective actions taken (if any) for each exceedance.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart UUUU]

f) The permittee shall submit quarterly deviation (excursion) reports identifying all periods of time during which the pressure in the manufacturing area of the facility did not comply with the negative pressure requirement in 4.e).

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

g) General Reporting Requirements

(1) The permittee shall submit each applicable report in Table 8 to Subpart UUUU of 40 CFR Part 63.

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

(2) Compliance reports required by 40 CFR 63.5580(b)(4) may be submitted according to the same schedule required in A. Standard Terms of this permit.

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

(3) Compliance reports must contain the following information:

a. company name and address;

b. statement by a responsible official, with that officials name, title, and signature, certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete;

c. date of report, and beginning and ending dates of the reporting period;

d. if a start-up, shutdown, or malfunction occurred during the reporting period and the actions, consistent with the SSMP, taken in accordance with 40 CFR 63.10(d)(5)(i);

e. if no deviation occurred, a statement to that effect shall be made;

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

f. if there were no periods during which the CMS was out-out-control, a statement to that effect. (Specifications for out-of-control operation in the quality control plan are required under 40 CFR 63.8(d)(2));

[Authority for term: OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

g. the total operating time of each emissions unit; and

h. the number, duration, and cause of any deviations that occurred as well as any corrective action taken.

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

(4) For each deviation from an emissions limit or operating limit that occurs at any one or any combination of the emissions units P001 - P005 and P007 - P010 where a CMS is used to demonstrate continuous compliance with the emissions limit or operating limit, as specified in Tables 5 and 6 to 40 CFR, Part 63, Subpart UUUU, the compliance report must contain the information in g)(3)a. through d. above as well as the data in g)(4), as required by 40 CFR 63.5580(e). This includes periods of startup, shutdown, and malfunction.

a. The date and time that each malfunction started and stopped.

b. The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.

c. The date, time, and duration that each CMS was out-of-control.

d. The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

e. A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total emissions unit(s) operating time during that reporting period.

f. A breakdown of the total duration of the deviations during the reporting period, into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

g. A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total ~~source~~ emissions unit(s) operating time during that reporting period.

h. An identification of each HAP that is known to be in the emission stream at the affected emissions unit(s).

i. A brief description of the process units.

j. A brief description of the CMS.

k. The date of the latest CEMS certification or audit or CPMS inspection, calibration, or validation check.

l. A description of any changes in CMS, processes, or controls since the last reporting period.

m. The operating day average values of monitored parameters.

[Authority for term: OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

(5) Any record keeping and monitoring deviations with the requirements of 40 CFR, Part 63, Subpart UUUU, may be included as part of the semi-annual record keeping and monitoring deviation report required in A. Standard Terms of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

10. Ohio BAT and MACT Compliance Methods and Testing Requirements -

a) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 02-18240, issued on 12/26/03: b) through j). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

b) Emission Limitation:

Combined OC emissions shall not exceed 50.8 pounds per hour from P001, P002, P003, P004, P005, P007, P008, P009 and P010.

Applicable Compliance Method:

Compliance shall be determined by using 40 CFR, Part 60, Appendix A, Methods 1 through 4 and Method 15, as specified in j).

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

c) Emission Limitation:

Combined OC emissions shall not exceed 222.5 tons per year from P001, P002, P003, P004, P005, P007, P008, P009 and P010.

Applicable Compliance Method:

This tons per year emissions limitation was developed by multiplying the short-term allowable OC emissions limitation (50.8 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emissions limitation, compliance shall also be shown with the annual tons per year emissions limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

d) Emission Limitation:

Combined H_2S emissions shall not exceed 2.27 pounds per hour from P003, P004, P005, P007 and P010.

Applicable Compliance Method:

Compliance shall be determined by using 40 CFR, Part 60, Appendix A, Methods 1 through 4 and Method 15, as specified in j).

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

e) Emission Limitation:

Combined H_2S emissions shall not exceed 9.95 tons per year from P003, P004, P005, P007 and P010.

Applicable Compliance Method:

This annual mass emissions limitation was developed by multiplying the short-term allowable H_2S emissions limitation (2.27 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emissions limitation, compliance shall also be shown with the annual tons per year emissions limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

f) Emission Limitation:

The air pollution control system shall remove a minimum of 80 percent (%) of OC vented to it, averaged over the preceding 60 consecutive days.

Applicable Compliance Method:

The OC emissions control efficiency may be determined by the following equation:

EF = (1 - (BO / BI))

where:

EF = OC emissions removal efficiency of biofiltration units;

BO = OC outlet concentration from biofiltration units, as specified in 8.e); and

BI = OC inlet concentration to biofiltration units, as specified in 8.e).

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

g) Emission Limitation:

The inlet to the biofiltration system shall capture 85 percent (%) of all OC emissions from P001 - P005 and P007- P010.

Applicable Compliance Method:

The OC emissions capture efficiency may be determined by the following equation:

TCE = BI / (BI + V)

where:

TCE = total biofiltration capture efficiency of OC emissions;

BI = OC concentration at inlet to biofiltration unit as specified in 8.e).; and

V = OC concentration at inlet to plant ventilation stack as specified in 8.e).

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

h) Emission Limitation:

While any of the emissions units specified in b) are in operation, a negative pressure shall be maintained within the the closed vent system.

Applicable Compliance Method:

Compliance may be demonstrated by hanging lightweight strips of material from egress points abutting the manufacturing area and ensuring the air current is moving towards the manufacturing area.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

i) Emission Limitation:

The sum of all uncontrolled sulfide emissions (reported as carbon disulfide) shall be reduced by at least 75 percent (%) based on a 6-month rolling average.

Applicable Compliance Method:

Determination of sulfide concentration(s) must be determined at the inlet and outlet of each control device for each performance test run. See j) for the performance test requirements. Compliance may be demonstrated by using the following equation(s):

a. The total emissions rate of sulfide, as carbon disulfide, in the inlet and outlet of the vent stream, as specified in 40 CFR 63.5535(e)(2) may be determined as follows:

ESF = ECS + (EH x (MCS / MH)) + (ECOS x (MCS / MCOS))

where:

ESF = total emission rate of sulfide in the inlet or outlet stream, lb/hr, as carbon disulfide, as a daily average;

ECS = emission rate of carbon disulfide in stream, lb/hr;

EH = emission rate of hydrogen sulfide in stream, lb/hr;

MCS = mass of carbon disulfide per mole of carbon disulfide, 76 lb/lb-mole;

MH = mass of hydrogen sulfide per mole of hydrogen disulfide, 68 lb/lb-mole;

ECOS = emission rate of carbonyl sulfide in stream, lb/hr; and

MCOS = mass of carbonyl sulfide per mole of carbon disulfide, 120 lb/lb-mole.

[Authority for term: PTI 02-18240, OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

b. The sulfide emissions, as carbon disulfide, control efficiency as specified in 40 CFR 63.5535(e)(3) may be determined as follows:

$CE = (ESF_{INLET} - ESF_{OUTLET})/ESF_{INLET} \times 100.$

where:

CE = control efficieny, percent.

ESF_{INLET} = sulfide emissions rate in the inlet vent stream to the control device, in lbs/hr, as carbon disulfide, as a 6-month rolling average.

ESF_{OUTLET} = sulfide emissions rate in the outlet vent stream to the control device, in lbs/hr, as carbon disulfide, as a 6-month rolling average.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart UUUU]

j) The permittee shall conduct, or have conducted, emission testing for emissions units P001, P002, P003, P004, P005, P007, P008, P009 and P010 in accordance with the following requirements:

(1) The emission testing shall be conducted within six (6) months after the effective date of this permit and again within four and a half (4.5) years after the effective date of this permit.

(2) The emissions testing shall be conducted to demonstrate compliance with the following emissions limits for the combined emissions from P001-P005 and P007-P010:

a. 50.8 lbs/hr of OC emissions;

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

b. 85% OC emissions capture efficiency of the biofiltration air pollution control system;

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

c. 80% OC emissions control efficiency of the biofiltration air pollution control system; and

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

d. 75% sulfide emissions (reported as carbon disulfide) control efficiency of the biofiltration air pollution control system.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart UUUU]

(3) The following test method(s) shall be employed to demonstrate compliance with the emissions limitations specified in (2):

a. U. S. EPA methods 1 through 4, as specified in 40 CFR Part 60, Appendix A. Other U.S. EPA-approved test methods, specified in Table 4 to 40 CFR Part 63,

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

b. U.S. EPA Method 15 - Determination of hydrogen sulfide, carbonyl sulfide, and carbon disulfide emissions from stationary sources, as specified in 40 CFR Part 60, Appendix A. Other U.S. EPA-approved test methods, specified in Table 4 to 40 CFR Part 63, Subpart UUUU, may be used. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

(4) During the performance test(s), the permittee shall establish site-specific operating limits for each control technique, specified in Table 2 to 40 CFR Part 63, Subpart UUUU, used to comply with the emissions limitations requirements of 40 CFR Part 63, Subpart UUUU, for the biofiltration systems, according to the requirements of 40 CFR 63.5535 and Table 4 to 40 CFR Part 63, Subpart UUUU.

(5) The OC emissions capture efficiency (i.e. the per cent of total mass emissions of OC emitted from the emissions unit(s) which are vented to the vapor control system) and the OC emissions control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 (C) or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

(6) The test(s) to determine the OC emissions rate, in lbs/hr, in the exhaust gas stream shall be conducted while each of the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA Northeast District Office. Tests to determine the OC emissions capture and control efficiencies and the sulfides (reported as carbon disulfide) control efficiency shall be conducted at normal operating capacity, unless otherwise specified in Table 4 to 40 CFR, Part 63, Subpart UUUU.

(7) The test(s) to determine the sulfides (as carbon disulfide) emissions control efficiency shall be evaluated according to the equations in 40 CFR 63.5535(e).

(8) Three separate test runs for each performance test must be completed as specified in 40 CFR 63.7(e)(3). Each test run must last at least one (1) hour, except as specified in 40 CFR 63.490 (c) for batch process events.

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

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

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

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), OAC rule 3745-77-07(C)(1), and 40 CFR, Part 63, Subpart UUUU]

Air Toxic Language – Monitoring and Record Keeping Requirements

11. The permit to install application for these emissions unit(s) (P001, P002, P003, P004, P005, P007, P008, P009 and P010) 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 "Toxic Air Contaminant Statute" ORC 3704.03(F), was applied to 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~~ 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 "Review 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 work day and a 40-hour work week, 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):

(1) threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices" or

(2) STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold 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 then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, (i.e., "X' hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was used to determine the MAGLC:

TLV/10 x 8/X x 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 per year) or "worst case" toxic contaminants:

	Toxic Contaminant	
	Carbon Disulfide	Hydrogen Sulfide
Emissions Unit(s) Id	Maximum Hourly Emissions Rate (lbs/hr)	
P001	0.25	0
P002	0.25	0
P003	8.5	0.76
P004	8.5	0.76
P005	2.76	0.25
P007	25.88	0.12
P008	0.25	0
P009	0.25	0
P010	4.16	0.38
Combined total of P001-P005 and P007-P010	50.80	2.27
Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3)	69.86	3.13
MAGLC (ug/m^3)	741.43	331.19
TLV (mg/m^3)	31.14	13.91

The permittee, has demonstrated that emissions of carbon disulfide and hydrogen sulfide, from emissions unit(s) P001, P002, P003, P004, P005, P007, P008, P009 and P010, is calculated to be less than eighty percent 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 "Toxic Air Contaminant Statute", ORC 3704.03(F).

[Authority for term: ORC 3704.03(F)(3) (c) and F(4), OAC rule 3745-114-114-01, Option A, and Engineering Guide #70]

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

    a) changes in the composition of the materials used or the use of raw materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest 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 "Toxic 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 "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[Authority for term: ORC 3704.03(F)(3) (c) and F(4), OAC rule 3745-114-114-01, Option A, and Engineering Guide #70]

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

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 "Toxic 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 "Toxic 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 "Toxic 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.

[Authority for term: ORC 3704.03(F)(3) (c) and F(4), OAC rule 3745-114-114-01, Option A, and Engineering Guide #70]

14. 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 "Toxic 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.

[Authority for term: ORC 3704.03(F)(3) (c) and F(4), OAC rule 3745-114-114-01, Option A, and Engineering Guide #70]

15. Air Toxic Language – Reporting Requirements

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 quarterly deviation (excursion) reports. 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.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and Option A, Engineering Guide #70]

16. Miscellaneous Requirements

a) Combined OC emissions from P001, P002, P003, P004, P005, P007, P008, P009 and P010 are vented to a biofilter system.

b) Combined hydrogen sulfide (H_2S) emissions from P003, P004, P005, P007 and P010 are vented to a biofilter system.

c) The backup caustic scrubber was installed and is maintained as a backup piece of control equipment. This piece of control equipment is not needed to maintain compliance with the emissions limits for OCs, H_2S nor hazardous air pollutants (reported as carbon disulfide).

C. Emissions Unit Terms and Conditions

1. P001, P001

Operations, Property and/or Equipment Description:

Xanthation Reactor #1 and support equipment (396-gallon steeping caustic tank, 40-gallon carbon disulfide batch tank, 210-gallon water tank) for viscose production with a biofiltration system to control emissions of organic compounds (OCs) and hydrogen sulfide (H_2S) and a backup packed bed scrubber. (All applicable OCs and H_2S emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emissions limitation.)

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) See sections b)(1)c and b)(2)b.

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) (PTI 02-18240)	Emissions of organic compounds (OC) shall not exceed 0.25 pound per hour and 1.1 tons per year. See B.4.c) through B.4.e). Combined OC emissions from P001-P005 and P007-P010 shall not exceed 50.8 pounds per hour and 222.5 tons per year. See B.4c) through B.4.e).
b.	OAC rule 3745-21-07(G)(2)	Exempt, see b)(2)a.
c.	OAC rule 3745-21-07(M)(3)(a)	Exempt, see b)(2)b.
d.	40 CFR Part 63, Subpart UUUU (40 CFR 63.5480 - 5610)	The sum of all uncontrolled sulfide emissions (reported as carbon disulfide) shall be reduced by at least 75 percent (%) based on a six-month rolling average. See B.6.
e.	40 CFR 63.1 – 15 (40 CFR Part 63, Subpart UUUU Table 10)	Table 10 of Subpart UUUU of 40 CFR Part 63 - General Provisions Applicability to Subpart UUUU which shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

(2) Additional Terms and Conditions

a. The permittee shall not employ organic liquids which are photochemically reactive, as defined in OAC rule 3745-21-01(C)(5).

On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(2)a., d)(2) and e)(2).

b. In accordance with OAC rule 3745-21-07(M)(3)(d)(iii) this emissions unit shall not be subject to the requirements of paragraphs (M)(3)(a) and (M)(3)(b) of OAC rule 3745-21-07, provided that the OC emissions from this emissions unit are controlled by means of a biofiltration system that maintains an overall control efficiency of at least eighty per cent, by weight, in accordance with permit-to-install 02-13356. All OC emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emission limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-18240, issued on 12/26/03: d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall maintain the following records on all materials used in this emissions unit:

a. the identification of the chemical compound and its physical state; and

b. for any liquid organic materials, whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the record keeping requirements in d)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-18240, issued on 12/26/03: e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall submit deviation (excursion) reports identifying each day during which any photochemically reactive materials were employed.

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the reporting requirements in e)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-18240, issued on 12/26/03: f)(2)a. and f)(2)b. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) Compliance with the emission limitations and control system requirements specified in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 0.25 pound per hour.

Applicable Compliance Method:

If required, compliance may be demonstrated by using 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 15.

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

OC emissions shall not exceed 1.1 tons per year.

Applicable Compliance Method:

The tons per year emissions limitation was developed by multiplying the short-term allowable OC emissions limitation (0.25 lb/hr) by the maximum annual hours

of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emissions limitation, compliance shall also be shown with the annual emissions limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. P002, P002

Operations, Property and/or Equipment Description:

Xanthation Reactor #2 and support equipment (396-gallon steeping caustic tank, 40-gallon carbon disulfide batch tank, 210-gallon water tank) for viscose production with a biofiltration system to control emissions of organic compounds (OCs) and hydrogen sulfide (H_2S) and a backup packed bed scrubber. (All applicable OCs and H_2S emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emissions limitation.)

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) See sections b)(1)c and b)(2)b.

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) (PTI 02-18240)	Emissions of organic compounds (OC) shall not exceed 0.25 pound per hour and 1.1 tons per year. See B.4.c) through B.4.e). Combined OC emissions from P001-P005 and P007-P010 shall not exceed 50.8 pounds per hour and 222.5 tons per year. See B.4.c) through B.4.e).
b.	OAC rule 3745-21-07(G)(2)	Exempt, see b)(2)a.
c.	OAC rule 3745-21-07(M)(3)(a)	Exempt, see b)(2)b.
d.	40 CFR Part 63, Subpart UUUU (40 CFR 63.5480 - 5610)	The sum of all uncontrolled sulfide emissions (reported as carbon disulfide) shall be reduced by at least 75 percent (%) based on a six-month rolling average. See B.6.
e.	40 CFR 63.1 – 15 (40 CFR Part 63, Subpart UUUU Table 10)	Table 10 of Subpart UUUU of 40 CFR Part 63 - General Provisions Applicability to Subpart UUUU which shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

(2) Additional Terms and Conditions

a. The permittee shall not employ organic liquids which are photochemically reactive, as defined in OAC rule 3745-21-01(C)(5).

On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(2)a., d)(2) and e)(2).

b. In accordance with OAC rule 3745-21-07(M)(3)(d)(iii) this emissions unit shall not be subject to the requirements of paragraphs (M)(3)(a) and (M)(3)(b) of OAC rule 3745-21-07, provided that the OC emissions from this emissions unit are controlled by means of a biofiltration system that maintains an overall control efficiency of at least eighty per cent, by weight, in accordance with permit-to-install 02-13356. All OC emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emission limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirement

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-18240, issued on 12/26/03: d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall maintain the following records on all materials used in this emissions unit:

a. the identification of the chemical compound and its physical state; and

b. for any liquid organic materials, whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

[Note: After the removal of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the record keeping requirements in d)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-18240, issued on 12/26/03: e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall submit deviation (excursion) reports identifying each day during which any photochemically reactive materials were employed.

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the reporting requirements in e)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-18240, issued on 12/26/03: f)(2)a. and f)(2)b. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) Compliance with the emission limitations and control system requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 0.25 pound per hour.

Applicable Compliance Method:

If required, compliance may be demonstrated by using 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 15.

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

OC emissions shall not exceed 1.1 tons per year.

Applicable Compliance Method:

The tons/year emissions limitation was developed by multiplying the short-term allowable OC emissions limitation (0.25 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emissions limitation, compliance shall also be shown with the annual emissions limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

3. P003, P003

Operations, Property and/or Equipment Description:

Continuous Cellulose Sponge Cooking Machine #1 with a biofiltration system to control emissions of organic compounds (OCs) and hydrogen sulfide (H_2S) and a backup packed bed scrubber. (All applicable OCs and H_2S emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emissions limitation.)

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) See sections b)(1)c and b)(2)b.

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) (PTI 02-18240)	Emissions of organic compounds (OC) shall not exceed 8.5 pounds per hour and 37.22 tons per year. See B.4.c) through B.4.e). Combined OC emissions from P001-P005 and P007-P010 shall not exceed 50.8 pounds per hour and 222.5 tons per year. See B.4.c) through B.4.e). Emissions of hydrogen sulfide (H_2S) shall not exceed 0.76 pound per hour and 3.33 tons per year. See B.4.c) through B.4.e). Combined H_2S emissions from P003, P004, P005, P007 and P010 shall not exceed 2.27 pounds per hour and 9.95 tons per year. See B.4.c) through B.4.e).
b.	OAC rule 3745-21-07(G)(2)	Exempt, see b)(2)(a).
c.	OAC rule 3745-21-07(M)(3)(a)	Exempt, see b)(2)b.
d.	40 CFR Part 63, Subpart UUUU (40 CFR 63.5480 - 5610)	The sum of all uncontrolled sulfide emissions (reported as carbon disulfide) shall be reduced by at least 75 percent (%) based on a six-month rolling average. See B.6.
e.	40 CFR 63.1 – 15	Table 10 of Subpart UUUU of 40 CFR

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(40 CFR Part 63, Subpart UUUU Table 10)	Part 63 - General Provisions Applicability to Subpart UUUU which shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

(2) Additional Terms and Conditions

a. The permittee shall not employ organic liquids which are photochemically reactive, as defined in OAC rule 3745-21-01(C)(5).

On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(2)a., d)(2) and e)(2).

b. In accordance with OAC rule 3745-21-07(M)(3)(d)(iii) this emissions unit shall not be subject to the requirements of paragraphs (M)(3)(a) and (M)(3)(b) of OAC rule 3745-21-07, provided that the OC emissions from this emissions unit are controlled by means of a biofiltration system that maintains an overall control efficiency of at least eighty per cent, by weight, in accordance with permit-to-install 02-13356. All OC emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emission limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-18240, issued on 12/26/03: d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall maintain the following records on all materials used in this emissions unit:

a. the identification of the chemical compound and its physical state; and

b. for any liquid organic materials, whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the record keeping requirements in d)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-18240, issued on 12/26/03: e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall submit deviation (excursion) reports identifying each day during which any photochemically reactive materials were employed.

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the reporting requirements in e)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-18240, issued on 12/26/03: f)(2)a. through f)(2)d. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) Compliance with the emission limitations and control system requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 8.5 pounds per hour.

Applicable Compliance Method:

If required, compliance may be demonstrated by using 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 15.

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

OC emissions shall not exceed 37.22 tons per year.

Applicable Compliance Method:

The tons per year emissions limitation was developed by multiplying the short-term allowable OC emissions limitation (8.5 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emissions limitation, compliance shall also be shown with the annual emissions limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

H_2S emissions shall not exceed 0.76 pound per hour.

Applicable Compliance Method:

If required, compliance may be determined by using 40 CFR, Part 60, Appendix A, Method 1 through 4 and Method 15.

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

d. Emissions Limitation:

H_2S emissions shall not exceed 3.33 tons per year

Applicable Compliance Method:

The tons per year emissions limitation was developed by multiplying the short-term allowable H_2S emissions limitation (0.76 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emissions limitation, compliance shall also be shown with the annual emissions limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

4. P004, P004

Operations, Property and/or Equipment Description:

Continuous Cellulose Sponge Cooking Machine #2 with a biofiltration system to control emissions of organic compounds (OCs) and hydrogen sulfide (H_2S) and a packed bed scrubber. (All applicable OCs and H_2S emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emissions limitation.)

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) See sections b)(1)c and b)(2)b.

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) (PTI 02-18240)	Emissions of organic compounds (OC) shall not exceed 8.5 pounds per hour and 37.22 tons per year. See B.4.c) through B.4.e). Combined facility emissions of OC emissions from P001-P005 and P007-P010 shall not exceed 50.8 pounds per hour and 222.5 tons per year. See B.4.c) through B.4.e). Emissions of hydrogen sulfide (H_2S) shall not exceed 0.76 pound per hour and 3.33 tons per year. See B.4.c) through B.4.e). Combined facility emissions of H_2S emissions from P003, P004, P005, P007 and P010 shall not exceed 2.27 pounds per hour and 9.95 tons per year. See B.4.c) through B.4.e).
b.	OAC rule 3745-21-07(G)(2)	Exempt, see b)(2)a.
c.	OAC rule 3745-21-07(M)(3)(a)	Exempt, see b)(2)b.
d.	40 CFR Part 63, Subpart UUUU (40 CFR 63.5480 - 5610)	The sum of all uncontrolled sulfide emissions (reported as carbon disulfide) shall be reduced by at least 75 percent (%) based on a six-month rolling average. See B.6.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR 63.1 – 15 (40 CFR Part 63, Subpart UUUU Table 10)	Table 10 of Subpart UUUU of 40 CFR Part 63 - General Provisions Applicability to Subpart UUUU which shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

(2) Additional Terms and Conditions

a. The permittee shall not employ organic liquids which are photochemically reactive, as defined in OAC rule 3745-21-01(C)(5).

On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(2)a., d)(2) and e)(2).

b. In accordance with OAC rule 3745-21-07(M)(3)(d)(iii) this emissions unit shall not be subject to the requirements of paragraphs (M)(3)(a) and (M)(3)(b) of OAC rule 3745-21-07, provided that the OC emissions from this emissions unit are controlled by means of a biofiltration system that maintains an overall control efficiency of at least eighty per cent, by weight, in accordance with permit-to-install 02-13356. All OC emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emission limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-18240, issued on 12/26/03: d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall maintain the following records on all materials used in this emissions unit:

a. the identification of the chemical compound and its physical state; and

b. for any liquid organic materials, whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the record keeping requirements in d)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-18240, issued on 12/26/03: e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall submit deviation (excursion) reports identifying each day during which any photochemically reactive materials were employed.

[Note: After the removal of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the reporting requirements in e)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-18240, issued on 12/26/03: f)(2)a. through f)(2)d. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) Compliance with the emission limitations and control system requirements specified in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 8.5 pounds per hour.

Applicable Compliance Method:

If required, compliance may be demonstrated by using 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 15.

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

OC emissions shall not exceed 37.22 tons per year.

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (8.5 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

H_2S emissions shall not exceed 0.76 pound per hour.

Applicable Compliance Method:

If required, compliance may be determined by using 40 CFR, Part 60, Appendix A, Method 1 through 4 and Method 15.

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

d. Emissions Limitation:

H_2S emissions shall not exceed 3.33 tons per year.

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the short-term allowable H_2S emission limitation (0.76 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

5. P005, P005

Operations, Property and/or Equipment Description:

Cellulose Sponge Cloth Machine #1 with a biofiltration system to control emissions of organic compounds (OCs) and hydrogen sulfide (H_2S) and a packed bed scrubber. (All applicable OCs and H_2S emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emissions limitation.)

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) See sections b)(1)c and b)(2)b.

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) (PTI 02-18240)	Emissions of organic compounds (OC) shall not exceed 2.76 pounds per hour and 12.1 tons per year. See B.4.c) through B.4.e). Combined facility emissions of OC emissions from P001-P005 and P007-P010 shall not exceed 50.8 pounds per hour and 222.5 tons per year. See B.4.c) through B.4.e). Emissions of hydrogen sulfide (H_2S) shall not exceed 0.25 pound per hour and 1.1 tons per year. See B.4.c) through B.4.e). Combined facility emissions of H_2S emissions from P003, P004, P005, P007 and P010 shall not exceed 2.27 pounds per hour and 9.95 tons per year. See B.4.c) through B.4.e).
b.	OAC rule 3745-21-07(G)(2)	Exempt, see b)(2)a.
c.	OAC rule 3745-21-07(M)(3)(a)	Exempt, see b)(2)b.
d.	40 CFR Part 63, Subpart UUUU (40 CFR 63.5480 - 5610)	The sum of all uncontrolled sulfide emissions (reported as carbon disulfide) shall be reduced by at least 75 percent (%) based on a six-month rolling average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See B.6.
e.	40 CFR 63.1 – 15 (40 CFR Part 63, Subpart UUUU Table 10)	Table 10 of Subpart UUUU of 40 CFR Part 63 - General Provisions Applicability to Subpart UUUU which shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

(2) Additional Terms and Conditions

a. The permittee shall not employ organic liquids which are photochemically reactive, as defined in OAC rule 3745-21-01(C)(5).

On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(2)a., d)(2) and e)(2).

b. In accordance with OAC rule 3745-21-07(M)(3)(d)(iii) this emissions unit shall not be subject to the requirements of paragraphs (M)(3)(a) and (M)(3)(b) of OAC rule 3745-21-07, provided that the OC emissions from this emissions unit are controlled by means of a biofiltration system that maintains an overall control efficiency of at least eighty per cent, by weight, in accordance with permit-to-install 02-13356. All OC emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emission limitation.

c) Operational Restriction

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-18240, issued on 12/26/03: d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall maintain the following records on all materials used in this emissions unit:

a. the identification of the chemical compound and its physical state; and

b. for any liquid organic materials, whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the record keeping requirements in d)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-18240, issued on 12/26/03: e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall submit deviation (excursion) reports identifying each day during which any photochemically reactive materials were employed.

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the reporting requirements in e)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-18240, issued on 12/26/03: f)(2)a. through f)(2)d. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) Compliance with the emission limitations and control system requirements specified in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 2.76 pounds per hour.

Applicable Compliance Method:

If required, compliance may be demonstrated by using 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 15.

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

OC emissions shall not exceed 12.1 tons per year.

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (2.76 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation

H_2S emissions shall not exceed 0.25 pound per hour.

Applicable Compliance Method:

If required, compliance may be determined by using 40 CFR, Part 60, Appendix A, Method 1 through 4 and Method 15.

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

d. Emissions Limitation:

H_2S emissions shall not exceed 1.1 tons per year.

Applicable Compliance Method:

The tons per year emissions limitation was developed by multiplying the short-term allowable H_2S emissions limitation (0.25 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emissions limitation, compliance shall also be shown with the annual emissions limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

6. P007, P007

Operations, Property and/or Equipment Description:

Cellulose Sponge Block Line with a biofiltration system to control emissions of organic compounds (OCs) and hydrogen sulfide (H_2S) and a packed bed scrubber. (All applicable OCs and H_2S emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emissions limitation.)

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) See sections b)(1)c and b)(2)b.

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) (PTI 02-18240)	Emissions of organic compounds (OC) shall not exceed 25.88 pounds per hour and 113.34 tons per year. See B.4.c) through B.4.e). Combined facility emissions of OC emissions from P001-P005 and P007-P010 shall not exceed 50.8 pounds per hour and 222.5 tons per year. See B.4.c) through B.4.e). Emissions of hydrogen sulfide (H_2S) shall not exceed 0.12 pound per hour and 0.53 ton per year. See B.4.c) through B.4.e). Combined facility emissions of H_2S emissions from P003, P004, P005, P007 and P010 shall not exceed 2.27 pounds per hour and 9.95 tons per year. See B.4.c) through B.4.e).
b.	OAC rule 3745-21-07(G)(2)	Exempt, see b)(2)a.
c.	OAC rule 3745-21-07(M)(3)(a)	Exempt, see b)(2)b.
d.	40 CFR Part 63, Subpart UUUU (40 CFR 63.5480 - 5610)	The sum of all uncontrolled sulfide emissions (reported as carbon disulfide) shall be reduced by at least 75 percent (%) based on a six-month rolling average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See B.6.
e.	40 CFR 63.1 – 15 (40 CFR Part 63, Subpart UUUU Table 10)	Table 10 of Subpart UUUU of 40 CFR Part 63 - General Provisions Applicability to Subpart UUUU which shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

(2) Additional Terms and Conditions

a. The permittee shall not employ organic liquids which are photochemically reactive, as defined in OAC rule 3745-21-01(C)(5).

On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(2)a., d)(2) and e)(2).

b. In accordance with OAC rule 3745-21-07(M)(3)(d)(iii) this emissions unit shall not be subject to the requirements of paragraphs (M)(3)(a) and (M)(3)(b) of OAC rule 3745-21-07, provided that the OC emissions from this emissions unit are controlled by means of a biofiltration system that maintains an overall control efficiency of at least eighty per cent, by weight, in accordance with permit-to-install 02-13356. All OC emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emission limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-18240, issued on 12/26/03: d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall maintain the following records on all materials used in this emissions unit:

a. the identification of the chemical compound and its physical state; and

b. for any liquid organic materials, whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the record keeping requirements in d)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-18240, issued on 12/26/03: e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall submit deviation (excursion) reports identifying each day during which any photochemically reactive materials were employed.

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the reporting requirements in e)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-18240, issued on 12/26/03: f)(2)a. through f)(2)d. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) Compliance with the emission limitations and control system requirements specified in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 25.88 pounds per hour.

Applicable Compliance Method:

If required, compliance may be demonstrated by using 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 15.

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

OC emissions shall not exceed 113.34 tons per year.

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (25.88 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

H_2S emissions shall not exceed 0.12 pound per hour.

Applicable Compliance Method:

If required, compliance may be determined by using 40 CFR, Part 60, Appendix A, Method 1 through 4 and Method 15.

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

d. Emissions Limitation:

H_2S emissions shall not exceed 0.53 ton per year.

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the short-term allowable H_2S emission limitation (0.12 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

7. P008, P008

Operations, Property and/or Equipment Description:

Xanthation Reactor #3 and support equipment (396-gallon steeping caustic tank, 40-gallon carbon disulfide batch tank, 210-gallon water tank) for viscose production with a biofiltration system to control emissions of organic compounds (OCs) and hydrogen sulfide (H_2S) and a packed bed scrubber. (All applicable OCs and H_2S emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emissions limitation.)

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) See sections b)(1)c and b)(2)b.

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) (PTI 02-18240)	Emissions of organic compounds (OC) shall not exceed 0.25 pound per hour and 1.1 tons per year. See B.4.c) through B.4.e). Combined facility emissions of OC emissions from P001-P005 and P007-P010 shall not exceed 50.8 pounds per hour and 222.5 tons per year. See B.4.c) through B.4.e).
b.	OAC rule 3745-21-07(G)(2)	Exempt, see b)(2)a.
c.	OAC rule 3745-21-07(M)(3)(a)	Exempt, see b)(2)b.
d.	40 CFR Part 63, Subpart UUUU (40 CFR 63.5480 - 5610)	The sum of all uncontrolled sulfide emissions (reported as carbon disulfide) shall be reduced by at least 75 percent (%) based on a six-month rolling average. See B.6.
e.	40 CFR 63.1 – 15 (40 CFR Part 63, Subpart UUUU Table 10)	Table 10 of Subpart UUUU of 40 CFR Part 63 - General Provisions Applicability to Subpart UUUU which shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

(2) Additional Terms and Conditions

a. The permittee shall not employ organic liquids which are photochemically reactive, as defined in OAC rule 3745-21-01(C)(5).

On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(2)a., d)(2) and e)(2).

b. In accordance with OAC rule 3745-21-07(M)(3)(d)(iii) this emissions unit shall not be subject to the requirements of paragraphs (M)(3)(a) and (M)(3)(b) of OAC rule 3745-21-07, provided that the OC emissions from this emissions unit are controlled by means of a biofiltration system that maintains an overall control efficiency of at least eighty per cent, by weight, in accordance with permit-to-install 02-13356. All OC emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emission limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-18240, issued on 12/26/03: d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall maintain the following records on all materials used in this emissions unit:

a. the identification of the chemical compound and its physical state; and

b. for any liquid organic materials, whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the record keeping requirements in d)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-18240, issued on 12/26/03: e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall submit deviation (excursion) reports identifying each day during which any photochemically reactive materials were employed.

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the reporting requirements in e)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-18240, issued on 12/26/03: f)(2)a. and f)(2)b. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) Compliance with the emission limitations and control system requirements specified in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 0.25 pound per hour.

Applicable Compliance Method:

If required, compliance may be demonstrated by using 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 15.

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

OC emissions shall not exceed 1.1 tons per year.

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.25 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

8. P009, P009

Operations, Property and/or Equipment Description:

Xanthation Reactor #4 and support equipment (396-gallon steeping caustic tank, 40-gallon carbon disulfide batch tank, 210-gallon water tank) for viscose production with a biofiltration system to control emissions of organic compounds (OCs) and hydrogen sulfide (H_2S) and a packed bed scrubber. (All applicable OCs and H_2S emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emissions limitation.)

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) See sections b)(1)c and b)(2)b.

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) (PTI 02-18240)	Emissions of organic compounds (OC) shall not exceed 0.25 pound per hour and 1.1 tons per year. See B.4.c) through B.4.e). Combined facility emissions of OC emissions from P001-P005 and P007-P010 shall not exceed 50.8 pounds per hour and 222.5 tons per year. See B.4.c) through B.4.e).
b.	OAC rule 3745-21-07(G)(2)	Exempt, see b)(2)a.
c.	OAC rule 3745-21-07(M)(3)(a)	Exempt, see b)(2)b.
d.	40 CFR Part 63, Subpart UUUU (40 CFR 63.5480 - 5610)	The sum of all uncontrolled sulfide emissions (reported as carbon disulfide) shall be reduced by at least 75 percent (%) based on a six-month rolling average. See B.6.
e.	40 CFR 63.1 – 15 (40 CFR Part 63, Subpart UUUU Table 10)	Table 10 of Subpart UUUU of 40 CFR Part 63 - General Provisions Applicability to Subpart UUUU which shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

(2) Additional Terms and Conditions

a. The permittee shall not employ organic liquids which are photochemically reactive, as defined in OAC rule 3745-21-01(C)(5).

On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(2)a., d)(2) and e)(2).

b. In accordance with OAC rule 3745-21-07(M)(3)(d)(iii) this emissions unit shall not be subject to the requirements of paragraphs (M)(3)(a) and (M)(3)(b) of OAC rule 3745-21-07, provided that the OC emissions from this emissions unit are controlled by means of a biofiltration system that maintains an overall control efficiency of at least eighty per cent, by weight, in accordance with permit-to-install 02-13356. All OC emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emission limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-18240, issued on 12/26/03: d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall maintain the following records on all materials used in this emissions unit:

a. the identification of the chemical compound and its physical state; and

b. for any liquid organic materials, whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the record keeping requirements in d)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-18240, issued on 12/26/03: e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall submit deviation (excursion) reports identifying each day during which any photochemically reactive materials were employed.

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the reporting requirements in e)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-18240, issued on 12/26/03: f)(2)a. and f)(2)b. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) Compliance with the emission limitations and control system requirements specified in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 0.25 pound per hour.

Applicable Compliance Method:

If required, compliance may be demonstrated by using 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 15.

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

OC emissions shall not exceed 1.1 tons per year.

Applicable Compliance Method:

The tons per year emission**s** limitation was developed by multiplying the short-term allowable OC emission**s** limitation (0.25 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

9. P010, P010

Operations, Property and/or Equipment Description:

Cellulose Sponge Cloth Machine #2 with a biofiltration system to control emissions of organic compounds (OCs) and hydrogen sulfide (H_2S) and a packed bed scrubber (All applicable OCs and H_2S emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emissions limitation.)

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) See sections b)(1)c and b)(2)b.

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) (PTI 02-18240)	Emissions of organic compounds (OC) shall not exceed 4.16 pounds per hour and 18.24 tons per year. See B.4.c) through B.4.e). Combined facility emissions of OC emissions from P001-P005 and P007-P010 shall not exceed 50.8 pounds per hour and 222.5 tons per year. See B.4.c) through B.4.e). Emissions of hydrogen sulfide (H_2S) shall not exceed 0.38 pound per hour and 1.66 tons per year. See B.4.c) through B.4.e). Combined facility emissions of H_2S emissions from P003, P004, P005, P007 and P010 shall not exceed 2.27 pounds per hour and 9.95 tons per year. See B.4.c) through B.4.e).
b.	OAC rule 3745-21-07(G)(2)	Exempt, see b)(2)a.
c.	OAC rule 3745-21-07(M)(3)(a)	Exempt, see b)(2)b.
d.	40 CFR Part 63, Subpart UUUU (40 CFR 63.5480 - 5610)	The sum of all uncontrolled sulfide emissions (reported as carbon disulfide) shall be reduced by at least 75 percent (%) based on a six-month rolling average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See B.6.
e.	40 CFR 63.1 – 15 (40 CFR Part 63, Subpart UUUU Table 10)	Table 10 of Subpart UUUU of 40 CFR Part 63 - General Provisions Applicability to Subpart UUUU which shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.

(2) Additional Terms and Conditions

a. The permittee shall not employ organic liquids which are photochemically reactive, as defined in OAC rule 3745-21-01(C)(5).

On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(2)a., d)(2) and e)(2).

b. In accordance with OAC rule 3745-21-07(M)(3)(d)(iii) this emissions unit shall not be subject to the requirements of paragraphs (M)(3)(a) and (M)(3)(b) of OAC rule 3745-21-07, provided that the OC emissions from this emissions unit are controlled by means of a biofiltration system that maintains an overall control efficiency of at least eighty per cent, by weight, in accordance with permit-to-install 02-13356. All OC emissions requirements are only applicable to the packed bed scrubber if this piece of control equipment is operated to demonstrate compliance with an emission limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-18240, issued on 12/26/03: d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall maintain the following records on all materials used in this emissions unit:

a. the identification of the chemical compound and its physical state; and

b. for any liquid organic materials, whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the record keeping requirements in d)(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-18240, issued on 12/26/03: e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall submit deviation (excursion) reports identifying each day during which any photochemically reactive materials were employed.

[Note: After the revision of OAC rule 3745-21-07 is approved by U.S. EPA as part of the Ohio SIP, the reporting requirements in e(2) shall be voided entirely.]

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-18240, issued on 12/26/03: f)(2)a. through f)(2)d. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) Compliance with the emission limitations and control system requirements specified in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 4.16 pounds per hour.

Applicable Compliance Method:

If required, compliance may be demonstrated by using 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 15.

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

OC emissions shall not exceed 18.24 tons per year.

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the short-term allowable OC emission limitation (4.16 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

H_2S emissions shall not exceed 0.38 pound per hour.

Applicable Compliance Method:

If required, compliance may be determined by using 40 CFR, Part 60, Appendix A, Method 1 through 4 and Method 15.

[Authority for term: PTI 02-18240, OAC rule 3745-15-04(A), and OAC rule 3745-77-07(C)(1)]

d. Emissions Limitation:

H_2S emissions shall not exceed 1.66 tons per year

Applicable Compliance Method:

The tons per year emissions limitation was developed by multiplying the short-term allowable H_2S emissions limitation (0.38 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emissions limitation, compliance shall also be shown with the annual emissions limitation.

[Authority for term: PTI 02-18240 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.