



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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

7/24/2009

Mr. Alan Sampson
OMNOVA Solutions Inc.
165 S. CLEVELAND AVENUE
MOGADORE, OH 44260

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1667000007
Permit Number: P0105137
Permit Type: Initial Installation
County: Portage

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Record Courier. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
ARAQMD; Pennsylvania; West Virginia; Canada

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

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
OMNOVA Solutions Inc.

Issue Date: 7/24/2009
Permit Number: P0105137
Permit Type: Initial Installation
Permit Description: Installation of a new polymerization process.
Facility ID: 1667000007
Facility Location: OMNOVA Solutions Inc.
165 S. CLEVELAND AVENUE,
MOGADORE, OH 44260
Facility Description: Plastics Material and Resin Manufacturing, Synthetic Rubber Manufacturing, Surface
Active Agent Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Laura Miracle at Akron Regional Air Quality Management District, 146 South High Street, Room 904 or (330)375-2480. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: OMNOVA Solutions Inc. manufactures specialty polymers. The facility consists of a pyrolysis furnace (N001), eleven storage tanks (T011 and T014 through T020), several boilers, and nine processes for the production of specialty polymers (P004, P013, P014, P101, P103, P105, P106, P110, and P115). The facility is installing a new polymerization process (P015).

3. Facility Emissions and Attainment Status: OMNOVA Solutions Inc. current potential to emit for the facility is limited to 5.0 tons of styrene per year, 9.99 tons of any individual hazardous air pollutant (HAP) per year, and 24.99 tons of combined HAPs per year and 2.15 tons of organic compounds from emissions units P004, P013, P014, P101, P103, P105, P106, P110, and P115, as a rolling, 12-month summation. With the addition of emissions unit P015, the potential to emit for combined HAPs would exceed the Title V threshold. The facility is located in Portage County which is non attainment for ozone.

4. Source Emissions: With the installation of emissions unit P015, OMNOVA Solutions Inc. has requested to continue to restrict their potential emissions to below Title V thresholds. The potential to emit for styrene, any individual HAP, and combined HAPs will continue to be restricted to 5.0 tons per year, 9.99 tons per year, and 24.99 tons per year, respectively, as a rolling, 12-month summation. The OC emissions from the thermal oxidizer for emissions units P004, P013, P014, P015, P101, P103, P105, P106, P110, and P115 will continue to be restricted to 2.15 tons per year, as a rolling, 12-month summation. The potential emissions will be restricted by employing a thermal oxidizer with a control efficiency of 98%. The emissions will be tracked on a monthly basis and a continuous emissions monitoring system will be employed to verify the OC emissions.

5. Conclusion: Through the use of a thermal oxidizer, a CEM for OC emissions, and monthly record keeping of the facility emissions, the facility will be able to restrict the emissions of any individual HAP, combined HAPs, and OC to below the Title V thresholds.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	2.15*
Individual HAP	9.99*
Combined HAP	24.99*
Styrene	5.0*

*As a rolling 12-month summation of the monthly emissions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate
for
OMNOVA Solutions Inc.

Facility ID: 1667000007
Permit Number: P0105137
Permit Type: Initial Installation
Issued: 7/24/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
OMNOVA Solutions Inc.

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105137

Facility ID: 1667000007

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1667000007
Application Number(s): A0037621
Permit Number: P0105137
Permit Description: Installation of a new polymerization process.
Permit Type: Initial Installation
Permit Fee: \$750.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 7/24/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

OMNOVA Solutions Inc.
165 S. CLEVELAND AVENUE
MOGADORE, OH 44260

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105137

Facility ID: 1667000007

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0105137

Permit Description: Installation of a new polymerization process.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P015
Company Equipment ID:	SA Polymerization
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105137

Facility ID: 1667000007

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105137

Facility ID: 1667000007

Effective Date: To be entered upon final issuance

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105137

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Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105137

Facility ID: 1667000007

Effective Date: To be entered upon final issuance

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105137

Facility ID: 1667000007

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P015, SA Polymerization

Operations, Property and/or Equipment Description:

SA Polymerization Process

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. g)(1).
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)c., c)(1), d)(1), d)(2), d)(3), d)(4), d)(5), d)(6), d)(7), e)(1), e)(2), and f)(1).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements do not apply to the organic compound (OC) emissions from this air contaminant source since the calculated annual emission rate for OC emissions is less than 10 tons per year taking into account the federally enforceable rule limit of 98% control efficiency for carbon incinerated to carbon dioxide under OAC rule 3745-31-05(D).
b.	OAC rule 3745-21-07(G)(2)	The emission limitations required by OAC rule 3745-21-07(G) are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(D). See b)(2)a.
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and MACT applicability under 40 CFR Part 63, Subpart U)	The thermal oxidizer shall achieve at least a 98% control efficiency for carbon incinerated to carbon dioxide. Emissions of styrene from the facility shall



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>not exceed 5.0 tons per year (tpy), based upon a rolling, 12-month summation of the monthly emissions.</p> <p>OC emissions from emissions units P004, P013, P014, P015, P101, P103, P105, P106, P110, and P115, combined, shall be vented to the thermal oxidizer; and organic compound emissions from the thermal oxidizer shall not exceed 2.15 tpy, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>Hazardous air pollutant (HAP) emissions from this facility shall not exceed 9.99 tpy for any single HAP and 24.99 tpy for any combination of HAPs, based upon rolling, 12-month summations of the monthly HAPs emissions.</p>

(2) Additional Terms and Conditions

a. On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio. It should be noted that the requirements to comply with OAC rule 3745-21-07(G)(2) shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

c) Operational Restrictions

(1) The thermal oxidizer shall be operated at all times whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion chamber temperature within the thermal oxidizer, during any 3-hour period of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be less than 1,451 degrees Fahrenheit.

(2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees



Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion chamber temperature within the thermal oxidizer was less than 1,451 degrees Fahrenheit; and
 - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.
- (3) Whenever the monitored average combustion chamber temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

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

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the temperature readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.



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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) The permittee shall operate and maintain equipment to continuously monitor and record OC emissions from the thermal oxidizer in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The continuous OC monitoring system, which includes the flow monitoring equipment, shall maintain a minimum 95 percent data capture efficiency.

A statement of certification of the existing continuous organic compound monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

The permittee shall maintain a written quality assurance/quality control plan for the continuous OC monitoring system designed to ensure continuous valid and representative readings of OC. The plan shall follow the requirements of 40 CFR Part 60, Appendix F, except that the requirement in 40 CFR Part 60, Appendix F, Section 5.1.1 shall not apply if the permittee meets the requirements in f)(2) below. The quality assurance/quality control plan and a logbook dedicated to the continuous OC monitoring system must be kept on site and available for inspection during regular office hours.

To convert the output of the OC monitor from parts per million by volume (ppmv) of methane to ppmv of styrene and butadiene, appropriate response factors for the OC monitor shall be used. The response factor (RF) is defined as the ratio of the known concentration of the target compound (styrene or butadiene) to the observed meter reading when the instrument has been calibrated with the reference compound (methane). The response factor is equal to the true concentration divided by the instrument reading. In order for the RF to be acceptable, it must be determined to be less than 10 before the instrument can be used in the monitoring program. The RF for each combination of reference compound and target compound may be determined by testing or may be obtained from a "reference" source.

- (5) The permittee shall maintain records of all data obtained by the continuous OC monitoring system including, but not limited to, parts per million OC on an instantaneous (one minute) basis, emissions of OC in units of the applicable standard in the appropriate averaging period (i.e., hourly; rolling, 3-hour average; monthly; and 12-



month rolling summation), hourly emissions of butadiene, hourly emissions of styrene, the results of daily zero/span calibration checks, and the magnitudes of manual calibration adjustments.

- (6) The permittee shall maintain monthly records of the total facility emissions for each individual HAP and combined HAPs. The permittee shall also maintain monthly records of the rolling, 12-month summation of the total facility emissions for each individual HAP and combined HAPs.
- (7) For emissions units P004, P013, P014, P015, P101, P103, P105, P106, P110, and P115, the permittee shall maintain monthly records of OC emissions from the thermal oxidizer. The permittee also shall maintain monthly records of the rolling, 12-month summation of OC emissions from the thermal oxidizer.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. each 3-hour period of time (start time and date, and end time and date) when the average combustion chamber temperature within the thermal oxidizer was less than 1,451 degrees Fahrenheit;
 - ii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
 - iii. a log of the downtime for the capture (collection) system, control equipment, temperature monitoring device, and emissions monitoring equipment, when the associated emissions unit(s) was/were in operation (date, time, duration and reason);
 - iv. the total operating time for the emissions unit and the total operating time of the monitors while the emissions unit was on line;
 - v. all exceedances of the rolling, 12-month emission limitation for OC;
 - vi. all exceedances of the rolling, 12-month emission limitation for any individual HAP;
 - vii. all exceedances of the rolling, 12-month emission limitation for styrene; and
 - viii. all exceedances of the rolling, 12-month emission limitation for combined HAPs.



- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual permit evaluation report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (3) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

The thermal oxidizer shall achieve at least a 98% control efficiency for carbon incinerated to carbon dioxide.

Applicable Compliance Method:

If required in writing by the Director (the appropriate District Office or local air agency), the permittee shall demonstrate compliance with the allowable control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) in accordance with the test methods and procedures specified in 3745-21-10 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.



b. Emission Limitation:

Emissions of styrene from the facility shall not exceed 5.0 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable styrene emission limitation above shall be determined in accordance with the methodology specified in the document dated December 31, 1995 and entitled, "Methodology for Determining Monthly Styrene Emissions from the GenCorp, Inc. Facility in Mogadore," prepared by the Ohio EPA and GenCorp, Inc., and any subsequent modifications that are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and OMNOVA Solutions Inc. and in accordance with the record keeping requirements established in d)(6) above.

c. Emission Limitation:

OC emissions from the thermal oxidizer shall not exceed 2.15 tpy, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in d)(7) above and through the use of the OC continuous emission monitoring system operated in accordance with 40 CFR Part 60.13 and 40 CFR Part 60, Appendix F as established in d)(4) above.

d. Emission Limitations:

HAP emissions from this facility shall not exceed 9.99 tpy for any single HAP and 24.99 tpy for any combination of HAPs, based upon rolling, 12-month summations of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations shall be demonstrated through the record keeping requirements established in d)(6) above and the following:

- i. To demonstrate compliance with the annual HAP emission limitation for styrene, the permittee shall use the methodology specified in the document dated December 31, 1995 and entitled, "Methodology for Determining Monthly Styrene Emissions from the GenCorp, Inc. Facility in Mogadore," prepared by the Ohio EPA and GenCorp, Inc., and any subsequent modifications that are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and OMNOVA Solutions Inc.
- ii. To demonstrate compliance with the monthly and annual HAP limitations for all other individual HAPs, except styrene, the monthly and annual



actual emissions for each of these other HAPs shall be used and shall be calculated as indicated in the document entitled, "Mogadore Air Emissions Inventory", as submitted to the Akron RAQMD on August 28, 1996 (or the latest update to that document).

- iii. To demonstrate compliance with the annual limitation for combined HAPs, the mass emissions of each HAP, as described in f)(1)f.i. and f)(1)f.ii. above, shall be summed to obtain the total facility emissions, except that stack emissions from the thermal oxidizer shall be counted as 1,3-butadiene or styrene, whichever mass quantity is greater.
- (2) By passing a quarterly cylinder gas audit (CGA) of the continuous emissions monitoring system (CEMS) in accordance with the requirements of 40 CFR Part 60, Appendix F, Section 5.1.2, the CEMS shall be deemed to be in compliance with d)(4) above. As long as all four of the quarterly CGA for the year are passed, the permittee shall not be required to conduct an annual relative accuracy test audit (RATA) of the CEMS, as required in 40 CFR Part 60, Appendix F, Section 5.1.1.
- g) **Miscellaneous Requirements**
- (1) Modeling to demonstrate compliance with, the A Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.