



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

10/6/2009

Certified Mail

MICHAEL DESGRANGES  
CAPITAL RESIN CORP  
324 DERING AVE  
COLUMBUS, OH 43207

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0125040238  
Permit Number: P0105380  
Permit Type: Initial Installation  
County: Franklin

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 Columbus Dispatch. 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 Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049

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 Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
Ohio EPA-CDO

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



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
CAPITAL RESIN CORP

Issue Date: 10/6/2009  
Permit Number: P0105380  
Permit Type: Initial Installation  
Permit Description: Heated tray dryer with wet scrubber  
Facility ID: 0125040238  
Facility Location: CAPITAL RESIN CORP  
324 DERING AVENUE,  
COLUMBUS, OH 43207  
Facility Description: All Other Basic Organic Chemical 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 John Kirwin at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049 or (614)728-3778. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Capital Resins (CRC) installed a pilot tray dryer in 2002 to remove interstitial water from ion exchange resin beads. The dryer currently operates as a de minimis source with a wet scrubber calculated to remove 8.85 lbs amine/day released during drying of 5,000 lbs of Dowex M-43 beads. CRC is proposing to dry PD 206 ion exchange resin beads used in the production of biodiesel that contain residual methanol from cleaning.

3. Facility Emissions and Attainment Status:

CRC operates as a synthetic minor facility with a calculated PTE of 6.7 ton formaldehyde, 8.83 ton methanol, 1.5 ton toluene, 19.6 tons total HAPs and 67.8 ton OC. Franklin County is designated as being in basic non-attainment for ozone and PM2.5.

4. Source Emissions:

CRC proposes to dry 500 lbs of resin in a 16 hour batch containing an average of 5%/w methanol released during the first hour removed with an estimated 90% efficiency across the wet scrubber.

Controlled emission rate:  $500 \text{ lb batch} * 0.05 \text{ methanol} * (1 - 0.9) = 2.5 \text{ lb OC batch} * 120 \text{ batch} * 1 / 2000 \text{ lb} = 0.15 \text{ ton/yr.}$

5. Conclusion:

The permit will have federally enforceable restrictions on the scrubber operation to ensure that HAP emissions do not exceed the Title V and MACT 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	0.15
Methanol	0.15





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

**DRAFT**

**Air Pollution Permit-to-Install and Operate  
for  
CAPITAL RESIN CORP**

Facility ID: 0125040238  
Permit Number: P0105380  
Permit Type: Initial Installation  
Issued: 10/6/2009  
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  
**CAPITAL RESIN CORP**

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0105380

**Facility ID:** 0125040238

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

## Authorization

Facility ID: 0125040238  
Application Number(s): A0038229  
Permit Number: P0105380  
Permit Description: Heated tray dryer with wet scrubber  
Permit Type: Initial Installation  
Permit Fee: \$200.00 *DO NOT send payment at this time - subject to change before final issuance*  
Issue Date: 10/6/2009  
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:

CAPITAL RESIN CORP  
324 DERING AVENUE  
COLUMBUS, OH 43207

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

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

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

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:** P0105380

**Facility ID:** 0125040238

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

## Authorization (continued)

Permit Number: P0105380

Permit Description: Heated tray dryer with wet scrubber

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

<b>Emissions Unit ID:</b>	<b>P028</b>
Company Equipment ID:	Pilot Tray Dryer
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:** P0105380

**Facility ID:** 0125040238

**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 Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

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

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

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the 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:** P0105380

**Facility ID:** 0125040238

**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**

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## **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:** P0105380

**Facility ID:** 0125040238

**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:** P0105380

**Facility ID:** 0125040238

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

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



**1. P028, Pilot Tray Dryer**

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

Heated Tray Dryer with Wet Scrubber (500 lb batch)

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. None.

(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)b., b)(2).b., c)(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) (voluntary restriction to avoid BAT)	See (2)a and d)(2) below.
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V and MACT requirement)	See (2)b below.

(2) Additional Terms and Conditions

a. "The Permit to Install and Operate for this air contaminant source takes into account the following voluntary restrictions specified in (2)a.i and (2)a.ii (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

i. desorbed organic compound (OC) emissions from this emissions unit shall, at a minimum, be vented to a wet scrubber during the first hour of drying PD 206 ion exchange beads; and

ii. OC emission from the stack serving this emissions unit shall not exceed 0.15 ton per year.



- b. Facility-wide emissions shall not exceed 99.9 tons of OC, 9.9 tons of individual hazardous air pollutant (HAP) emissions and 24.9 tons of total combined hazardous air pollutant (HAPs) emissions per rolling, 12-month period.

Facility-wide emissions shall be determined from a summation of monthly emissions from the following emission units: P004, P005, P006, P007, P008, P010, P012, P013, P014, P016, P027, P018, P019, P020, P021, P023, P024, P025, P026, P028 and all emissions units that are exempt or permit by rule (OAC rule 3745-31-03), and de minimis (OAC rule 3745-15-05).

Therefore, the provisions for Title V permitting and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing in 40 CFR Part 63 Subpart FFFF will not be applicable.

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

c) Operational Restrictions

- (1) The permittee shall not dry more than 120 batches of PD 206 ion exchange beads during any rolling, 12-month period.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following monthly records on-site to document compliance with the OC emission limitation for this emissions unit and the restrictions of OC, individual HAP, and total HAPs for emission units P004, P005, P006, P007, P008, P010, P012, P013, P014, P016, P027, P018, P019, P020, P021, P023, P024, P025, P026, P028 and any permit exempt and de minimis emissions units:

- a. the number of batches produced for this emissions unit;
- b. the calculated OC emissions for the current month, in pounds or tons, for each the above emissions units;
- c. the rolling, 12-month summation of OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months) for each of the above emissions units;
- d. the rolling, 12-month summation of OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months) for all the above emissions units;
- e. the calculated individual HAP emission for the current month, in pounds or tons, for each of the above emissions units;
- f. the calculated total combined HAP emissions for the current month, in pounds or tons, for each the above emissions units;
- g. the rolling 12-month summation of individual HAP emission (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months) for all the above emissions units; and



- h. the rolling 12-month summation of total combined HAP emissions (i.e., the total combined HAP emissions from the current month added to the summation of the total combined HAP emissions from the previous 11 months) for all the above emissions units.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in inches of water) during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with good engineering practices. The acceptable pressure drop across the wet scrubber shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.

Whenever the monitored value for any parameter deviates from the range of not less than 1 inch nor greater than 10 inch static pressure drop in inches of water 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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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 the 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 pressure drop 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.



These range(s) and/or limit(s) for the pressure drop across the scrubber are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop based upon information obtained during future emission tests that demonstrate compliance with the allowable HAP emission rate for this/these emissions unit(s). In addition, approved revisions to the range or 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.

[OAC rule 3745-31-05(E)]

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

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly 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:  
  
(2)a, (2)b and d)(2)
  - 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).

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



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

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]

f) Testing Requirements

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

a. Emissions Limitations:

Organic compound (OC) emission from the stack serving this emissions unit shall not exceed 0.15 ton per year.

Applicable Compliance Method:

Compliance with the annual emission limitation may be demonstrated by the record keeping requirements specified in d)(1)c.

The individual batch emissions rate is derived using a mass balance calculation based on the documented evaporative losses (500 lb batch \* 0.05 methanol) multiplied times the removal efficiency of the wet scrubber system (1 – 0.90) multiplied times the number of batches (120) and divided by 2,000 lbs per ton.

b. Emissions Limitation:

The facility-wide individual and combined HAP emissions shall not exceed 9.9 tons and 24.9 tons per rolling, 12-month period, respectively.

Applicable Compliance Method:

Compliance with the facility-wide HAP emission limitations shall be demonstrated by the record keeping requirements specified in d)(1)g and d)(1)h above.

c. Emissions Limitation:

The facility-wide OC emissions shall not exceed 99.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the facility-wide HAP emission limitations shall be demonstrated by the record keeping requirements specified in d)(1)d above.

g) Miscellaneous Requirements

- (1) None.