



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

04/24/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

03-35-01-0105
Campbell Soup Company
Michael N. Maringer
Campbell Soup Supply Company LLC
12-773 State Route 110
Napoleon, OH 43545

Dear Michael N. Maringer:

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 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Northwest District Office.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northwest District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 04/24/02	Effective Date: 04/24/02	Expiration Date: 04/24/07
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This document constitutes issuance of a Title V permit for Facility ID: 03-35-01-0105 to:
 Campbell Soup Company
 347 North Dunbridge Road
 Bowling Green, OH 43402

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B001 (Boiler #1) Boiler #1 (Coal Fired)	B007 (Boiler #5) Boiler #5 (Natural Gas fired)	Vegetable Waste Dryer (Rotary Dryer)
B002 (Boiler #2) Boiler #2 (Coal Fired)	B008 (Boiler #6) Boiler #6 (Natural Gas fired)	R001 (Trine Labeler #1) Trine Labeler #1
B003 (Boiler #3) Boiler #3 (#6 Oil Fired)	B009 (Boiler #7) Boiler #7 (Natural Gas fired)	R002 (Trine Labeler #2) Trine Labeler #2
B004 (Boiler #4) Boiler #4 (#6 Oil Fired)	P005 (Veg Waste Dryer)	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. 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, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office
 (419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
 Director

PART I - GENERAL TERMS AND CONDITIONS

A. *State and Federally Enforceable Section*

1. **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, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, 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 taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., 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.) See B.6 below if no deviations occurred during the quarter.

- (Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*
- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- (Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*
- iv. 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 are true, accurate, and complete.
- (Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

2. 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, i.e., upset condition, of any emissions unit(s) 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, 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).

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

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

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

4. 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))

5. 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))

6. 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 A.10 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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))

8. 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))

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. 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))

11. 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))

12. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. 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.
- iii. 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))

13. 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))

14. 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))

15. 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))

16. 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 emission 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; and
- 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.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

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

17. 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.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

19. 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))

20. 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))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

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 (a) 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, (b) the probable cause of such deviations, and (c) 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. 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 quarterly, i.e., 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.)

2. Records Retention Requirements

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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

fuel dispensing facility, emissions unit G001;
solvent clean tank, emissions unit L005;
solvent clean tank, emissions unit L014;
solvent clean tank, emissions unit L016;
solvent clean tank, emissions unit L018;
#6 oil storage tank, emissions unit T001;
exemption forms, emissions unit Z001;
fly/bottom ash disposal, emissions unit Z002;
solvent clean tank, emissions unit Z003;
solvent clean tank, emissions unit Z004;
solvent clean tank, emissions unit Z005;
solvent clean tank, emissions unit Z006;
video ink jet printers, emissions unit Z007;
coal pile, emissions unit Z008;
coal ash silo, emissions unit Z009;
solvent clean tank, emissions unit Z010;
solvent clean tank, emissions unit Z011;
solvent clean tank, emissions unit Z012;
solvent clean tank, emissions unit Z013;
paved and unpaved parking lots & roadways, emissions unit Z014;
welding hoods, emissions unit Z015;
flour silo system, emissions unit Z016;
salt silos, emissions unit Z017;
lime/soda ash bunker, emissions unit Z018;
wastewater plant fugitive emissions, emissions unit Z019
emergency diesel generator, emissions unit Z020;
low service emergency generator, emissions unit Z021;
towmotor battery, emissions unit Z022;
solvent clean tank, emissions unit Z023;
digester boiler, emissions unit Z024;
vegetable preparation, emissions unit Z025;
blending, emissions unit Z026;
filling, emissions unit Z027;
sterilization, emissions unit Z028;
packaging, emissions unit Z029;
receiving, emissions unit Z030;

solvent clean tank, emissions unit Z031;
solvent clean tank, emissions unit Z032;
solvent clean tank, emissions unit Z033;
solvent clean tank, emissions unit Z034; and
solvent clean tank, emissions unit Z035.

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 a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #1 (B001)
Activity Description: Boiler #1 (Coal Fired)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
98.4 mmBtu/hr, coal-fired boiler, with electrostatic precipitator	OAC rule 3745-18-41(B)(1)	6.2 lbs sulfur dioxide (SO ₂)/mmBtu actual heat input
	OAC rule 3745-17-10(C)(1)	0.13 lb particulate emissions (PE)/mmBtu of actual heat input (See A.I.2.a.)
	OAC rule 3745-17-07(A)(1)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a The total combined heat input from emissions units B001, B002, B003 and B004 was used to determine the allowable PE rates (lbs PE/mmBtu of actual heat input) for these emissions units.

II. Operational Restrictions

1. The permittee shall operate the ESP during any operation of this emissions unit, except the ESP may not be operated during periods of start up until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP.
2. The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I above.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. A shipment may be comprised of multiple truck loads from the same supplier's batch and the quality of the coal for those loads may be represented by a single batch analysis from the supplier. At the end of each calendar month, a volume-weighted average value for heat content (Btu/pound of coal) and sulfur content (percent by weight) shall be calculated for all shipments to the permittee within the calendar month.

Each grab composite sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the coal sampling in accordance with the most recent version of the following ASTM methods: ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for sulfur content (percent) and heat content (Btu/pound of coal). The analytical methods for sulfur content and heat content shall be: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal or ASTM method D4239, Sulfur in the Analysis Sample of Coal Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865, Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

2. For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received, the permittee's or coal supplier's analyses for ash content, sulfur content, and heat content, and the calculated SO₂ emission rate, in lbs/mmBtu of actual heat input. Also, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during the calendar month.
3. The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the visible particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain the most recent certification letter that the company has received from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

4. The permittee shall record for each day the duration of the downtime for the monitoring equipment specified in section A.III.3 above, the ESP sections that are out of service, and the duration of the downtime for each section, when the associated emissions unit was in operation.
5. The permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP as follows:
 - a. during all periods of start up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i); and
 - b. during all periods of shutdown until the inlet temperature to the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i).

The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in degrees Fahrenheit.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation (lb/mmBtu), as shown by the calculated monthly sulfur dioxide emission rates from Section A.III.1. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of each calendar quarter when the deviation occurs.
2. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Northwest District Office of all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. The permittee shall submit deviation (excursion) reports that identify all periods of time during start up and shutdown of the emissions unit when the ESP was not in operation and the temperature of the boiler exhaust gases exceeded the temperature levels specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b)(i).
4. The permittee shall submit quarterly reports that identify the sections of the ESP that were out of service along with the time period(s) involved.
5. The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit, Paragraph A.1.c.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 1.a The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
 - 1.b The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of 0.13 lb PE/mmBtu of actual heat input.
 - 1.c The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1 - 5 of 40 CFR, Part 60, Appendix A.
 - 1.d The test(s) shall be conducted while this emissions unit and emissions unit B002, which is vented to the same control equipment, are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

2. 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, Northwest 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, Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northwest 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.

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, Northwest 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, Northwest District Office.

3. Compliance with emission limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- 3.a Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with OAC Rule 3745-17-03(B)(1).

- 3.b Emission Limitation:

6.2 lbs SO₂/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above through the record keeping requirements in section A.III of this permit.

If required by the Director, the permittee shall demonstrate compliance with the allowable emission limitation of 6.2 lbs SO₂/mmBtu of actual heat input using Method 6 of 40 CFR, Part 60, Appendix A.

- 3.c Emission Limitation:

0.13 lb PE/mmBtu

Applicable Compliance Method:

Compliance with the lb PE/mmBtu limitation above shall be based upon the results of emission testing conducted in accordance with the methods in OAC rule 3745-17-03(B)(9).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #2 (B002)
Activity Description: Boiler #2 (Coal Fired)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
98.4 mmBtu/hr, coal-fired boiler, with electrostatic precipitator	OAC rule 3745-18-41(B)(1)	6.2 lbs sulfur dioxide (SO ₂)/mmBtu actual heat input
	OAC rule 3745-17-10(C)(1)	0.13 lb particulate emissions (PE)/mmBtu of actual heat input (See A.I.2.a.)
	OAC rule 3745-17-07(A)(1)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a The total combined heat input from emissions units B001, B002, B003 and B004 was used to determine the allowable PE rates (lbs PE/mmBtu of actual heat input) for these emissions units.

II. Operational Restrictions

1. The permittee shall operate the ESP during any operation of this emissions unit, except the ESP may not be operated during periods of start up until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP.
2. The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I above.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. A shipment may be comprised of multiple truck loads from the same supplier's batch and the quality of the coal for those loads may be represented by a single batch analysis from the supplier. At the end of each calendar month, a volume-weighted average value for heat content (Btu/pound of coal) and sulfur content (percent by weight) shall be calculated for all shipments to the permittee within the calendar month.

Each grab composite sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the coal sampling in accordance with the most recent version of the following ASTM methods: ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for sulfur content (percent) and heat content (Btu/pound of coal). The analytical methods for sulfur content and heat content shall be: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal or ASTM method D4239, Sulfur in the Analysis Sample of Coal Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865, Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

2. For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received, the permittee's or coal supplier's analyses for ash content, sulfur content, and heat content, and the calculated SO₂ emission rate, in lbs/mmBtu of actual heat input. Also, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during the calendar month.
3. The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the visible particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain the most recent certification letter that the company has received from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

4. The permittee shall record for each day the duration of the downtime for the monitoring equipment specified in section A.III.3 above, the ESP sections that are out of service, and the duration of the downtime for each section, when the associated emissions unit was in operation.
5. The permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP as follows:
 - a. during all periods of start up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i); and
 - b. during all periods of shutdown until the inlet temperature to the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i).

The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in degrees Fahrenheit.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation (lb/mmBtu), as shown by the calculated monthly sulfur dioxide emission rates from Section A.III.1. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of each calendar quarter when the deviation occurs.
2. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Northwest District Office of all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. The permittee shall submit deviation (excursion) reports that identify all periods of time during start up and shutdown of the emissions unit when the ESP was not in operation and the temperature of the boiler exhaust gases exceeded the temperature levels specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b)(i).
4. The permittee shall submit quarterly reports that identify the sections of the ESP that were out of service along with the time period(s) involved.
5. The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit, Paragraph A.1.c.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 1.a The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
 - 1.b The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of 0.13 lb PE/mmBtu of actual heat input.
 - 1.c The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1 - 5 of 40 CFR, Part 60, Appendix A.
 - 1.d The test(s) shall be conducted while this emissions unit and emissions unit B002, which is vented to the same control equipment, are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

2. 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, Northwest 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, Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northwest 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.

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, Northwest 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, Northwest District Office.

3. Compliance with emission limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- 3.a Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with OAC Rule 3745-17-03(B)(1).

- 3.b Emission Limitation:

6.2 lbs SO₂/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above through the record keeping requirements in section A.III of this permit.

If required by the Director, the permittee shall demonstrate compliance with the allowable emission limitation of 6.2 lbs SO₂/mmBtu of actual heat input using Method 6 of 40 CFR, Part 60, Appendix A.

- 3.c Emission Limitation:

0.13 lb PE/mmBtu

Applicable Compliance Method:

Compliance with the lb PE/mmBtu limitation above shall be based upon the results of emission testing conducted in accordance with the methods in OAC rule 3745-17-03(B)(9).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #3 (B003)

Activity Description: Boiler #3 (#6 Oil Fired)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
114 mmBtu/hr, #6 oil-fired boiler	OAC rule 3745-18-41(B)(2)	2.1 lbs sulfur dioxide (SO ₂)/mmBtu of actual heat input
	OAC rule 3745-17-10(C)(1)	0.13 lb particulate emissions (PE)/mmBtu actual heat input (See A.1.2.a.)
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a The total combined heat input from emissions units B001, B002, B003 and B004 was used to determine the allowable PE rates (lbs PE/mmBtu of actual heat input) for these emissions units.

II. Operational Restrictions

1. The quality of oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 2.1 lbs of SO₂/mmBtu of actual heat input.

III. Monitoring and/or Record Keeping Requirements

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Northwest District Office in writing of any record that shows a deviation of the allowable sulfur dioxide limitation specified in Section A.I.1 of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 1.a The emission testing shall be conducted within 6 months prior to permit expiration.
 - 1.b The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of 0.13 lb PE/mmBtu.
 - 1.c The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1- 5 of 40 CFR, Part 60, Appendix A.
 - 1.d The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).

V. Testing Requirements (continued)

2. 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, Northwest 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, Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northwest 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.

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, Northwest 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, Northwest District Office

3. Compliance with emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- 3.a Emission Limitation:
2.1 lbs SO₂/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above through the record keeping requirements in section A.III of this permit.

If required, the permittee shall demonstrate compliance with the emission limitation above in accordance with 40 CFR, Part 60, Appendix A, Method 6C.

- 3.b Emission Limitation:
Visible PE shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with the methods in OAC rule 3745-17-03(B)(1).

- 3.c Emission Limitation:
0.13 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the lb PE/mmBtu limitation above shall be based upon the results of emission testing conducted in accordance with the methods in OAC rule 3745-17-03(B)(9).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #4 (B004)

Activity Description: Boiler #4 (#6 Oil Fired)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
114 mmBtu/hr, #6 oil-fired boiler	OAC rule 3745-18-41(B)(2)	2.1 lbs sulfur dioxide (SO ₂)/mmBtu of actual heat input
	OAC rule 3745-17-10(C)(1)	0.13 lb particulate emissions (PE)/mmBtu actual heat input (See A.1.2.a.)
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a The total combined heat input from emissions units B001, B002, B003 and B004 was used to determine the allowable PE rates (lbs PE/mmBtu of actual heat input) for these emissions units.

II. Operational Restrictions

1. The quality of oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 2.1 lbs of SO₂/mmBtu of actual heat input.

III. Monitoring and/or Record Keeping Requirements

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Northwest District Office in writing of any record that shows a deviation of the allowable sulfur dioxide limitation specified in Section A.I.1 of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 1.a The emission testing shall be conducted within 6 months prior to permit expiration.
 - 1.b The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of 0.13 lb PE/mmBtu.
 - 1.c The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: Methods 1- 5 of 40 CFR, Part 60, Appendix A.
 - 1.d The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Director (the Ohio EPA, Northwest District Office).

V. Testing Requirements (continued)

2. 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, Northwest 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, Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northwest 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.

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, Northwest 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, Northwest District Office

3. Compliance with emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- 3.a Emission Limitation:
2.1 lbs SO₂/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above through the record keeping requirements in section A.III of this permit.

If required, the permittee shall demonstrate compliance with the emission limitation above in accordance with 40 CFR, Part 60, Appendix A, Method 6C.

- 3.b Emission Limitation:
Visible PE shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with the methods in OAC rule 3745-17-03(B)(1).

- 3.c Emission Limitation:
0.13 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the lb PE/mmBtu limitation above shall be based upon the results of emission testing conducted in accordance with the methods in OAC rule 3745-17-03(B)(9).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #5 (B007)
Activity Description: Boiler #5 (Natural Gas fired)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
62 mmBtu/hr, natural gas-fired boiler	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input
	OAC rule 3745-18-06 (A)	See A.1.2.a.
	OAC rule 3745-31-05 (PTI #03-3309)	0.47 lb PE/hr, 2.06 tons PE/yr
		6.2 lbs nitrogen oxides (NOx)/hr, 27.16 tons NOx/yr
		5.2 lbs carbon monoxide (CO)/hr, 22.78 tons CO/yr
		0.34 lb organic compounds (OC)/hr, 1.49 tons OC/yr
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-18-06(A) and 3745-17-11(B).

2. Additional Terms and Conditions

- 2.a OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days following the end of each calendar quarter when the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with the methods in OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:
0.020 lb PE/mmBtu actual heat input

Applicable Compliance Method:

The permittee may determine compliance with limitation above by multiplying the maximum hourly natural gas consumption rate (62,000 cu. ft./hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu.ft, and then dividing by the maximum heat input capacity of the boiler (62 mmBtu/hr).

If required by the Director, compliance shall be determined in accordance with the methods in OAC rule 3745-17-03(B)(9).

- 1.c Emissions Limitations:
0.47 lb PE/hr, 2.06 tons PE/yr

Applicable Compliance Method:

The permittee may determine compliance with hourly PE limitation above by multiplying the maximum hourly natural gas consumption rate (62,000 cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mmcu.ft.

If required by the Director, compliance with the hourly PE limitation shall be determined in accordance with Methods 1- 5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is was determined by multiplying the hourly limit by 8760, and then dividing by 2000).

V. Testing Requirements (continued)

- 1.d** Emissions Limitations:
6.2 lbs NO_x/hr, 27.16 tons NO_x/yr

Applicable Compliance Method:

Compliance with the hourly limitation above may be determined by multiplying the emission factor from AP-42, Table 1.4 (revised 2/98) of 100 lbs NO_x/mm cu. ft. of natural gas by the maximum natural gas burning capacity of the emissions unit (0.062 mm cu. ft/hr).

If required by the Director, compliance with the hourly limitation shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was determined by multiplying the hourly limit by 8760, and then dividing by 2000).

- 1.e** Emissions Limitations:
5.2 lbs CO/hr, 22.78 tons CO/yr

Applicable Compliance Method:

Compliance with the hourly limitation above may be determined by multiplying the emission factor from AP-42, Table 1.4 (revised 2/98) of 84 lbs CO/mm cu. ft. of natural gas by the maximum natural gas burning capacity of the emissions unit (0.062 mm cu. ft/hr).

If required by the Director, compliance with the hourly limitation shall be determined in accordance with Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was determined by multiplying the hourly limit by 8760, and then dividing by 2000).

- 1.f** Emissions Limitations:
0.34 lbs OC/hr, 1.49 tons OC/yr

Applicable Compliance Method:

Compliance with the hourly limitation above may be determined by multiplying the emission factor from AP-42, Table 1.4 (revised 3/98) of 5.5 lbs OC/mm cu. ft of natural gas by the maximum natural gas burning capacity of the emissions unit (0.062 mm cu. ft/hr).

If required by the Director, compliance with the hourly limitation shall be determined in accordance with Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was determined by multiplying the hourly limit by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #6 (B008)

Activity Description: Boiler #6 (Natural Gas fired)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
62 mmBtu/hr, natural gas-fired boiler	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input
	OAC rule 3745-18-06 (A)	See A.1.2.a.
	OAC rule 3745-31-05 (PTI #03-3309)	0.47 lb PE/hr, 2.06 tons PE/yr
		6.2 lbs nitrogen oxides (NOx)/hr, 27.16 tons NOx/yr
		5.2 lbs carbon monoxide (CO)/hr, 22.78 tons CO/yr
		0.34 lb organic compounds (OC)/hr, 1.49 tons OC/yr
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-18-06(A) and 3745-17-11(B).

2. Additional Terms and Conditions

- 2.a OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days following the end of each calendar quarter when the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with the methods in OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:
0.020 lb PE/mmBtu actual heat input

Applicable Compliance Method:

The permittee may determine compliance with limitation above by multiplying the maximum hourly natural gas consumption rate (62,000 cu. ft./hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu.ft, and then dividing by the maximum heat input capacity of the boiler (62 mmBtu/hr).

If required by the Director, compliance shall be determined in accordance with the methods in OAC rule 3745-17-03(B)(9).

- 1.c Emissions Limitations:
0.47 lb PE/hr, 2.06 tons PE/yr

Applicable Compliance Method:

The permittee may determine compliance with hourly PE limitation above by multiplying the maximum hourly natural gas consumption rate (62,000 cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mmcu.ft.

If required by the Director, compliance with the hourly PE limitation shall be determined in accordance with Methods 1- 5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is was determined by multiplying the hourly limit by 8760, and then dividing by 2000).

V. Testing Requirements (continued)

- 1.d** Emissions Limitations:
6.2 lbs NO_x/hr, 27.16 tons NO_x/yr

Applicable Compliance Method:

Compliance with the hourly limitation above may be determined by multiplying the emission factor from AP-42, Table 1.4 (revised 2/98) of 100 lbs NO_x/mm cu. ft. of natural gas by the maximum natural gas burning capacity of the emissions unit (0.062 mm cu. ft/hr).

If required by the Director, compliance with the hourly limitation shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was determined by multiplying the hourly limit by 8760, and then dividing by 2000).

- 1.e** Emissions Limitations:
5.2 lbs CO/hr, 22.78 tons CO/yr

Applicable Compliance Method:

Compliance with the hourly limitation above may be determined by multiplying the emission factor from AP-42, Table 1.4 (revised 2/98) of 84 lbs CO/mm cu. ft. of natural gas by the maximum natural gas burning capacity of the emissions unit (0.062 mm cu. ft/hr).

If required by the Director, compliance with the hourly limitation shall be determined in accordance with Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was determined by multiplying the hourly limit by 8760, and then dividing by 2000).

- 1.f** Emissions Limitations:
0.34 lbs OC/hr, 1.49 tons OC/yr

Applicable Compliance Method:

Compliance with the hourly limitation above may be determined by multiplying the emission factor from AP-42, Table 1.4 (revised 3/98) of 5.5 lbs OC/mm cu. ft of natural gas by the maximum natural gas burning capacity of the emissions unit (0.062 mm cu. ft/hr).

If required by the Director, compliance with the hourly limitation shall be determined in accordance with Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was determined by multiplying the hourly limit by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #7 (B009)
Activity Description: Boiler #7 (Natural Gas fired)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
62 mmBtu/hr, natural gas-fired boiler	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input
	OAC rule 3745-18-06 (A)	See A.1.2.a.
	OAC rule 3745-31-05 (PTI #03-3309)	0.47 lb PE/hr, 2.06 tons PE/yr
		6.2 lbs nitrogen oxides (NOx)/hr, 27.16 tons NOx/yr
		5.2 lbs carbon monoxide (CO)/hr, 22.78 tons CO/yr
		0.34 lb organic compounds (OC)/hr, 1.49 tons OC/yr
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-18-06(A) and 3745-17-11(B).

2. Additional Terms and Conditions

- 2.a OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days following the end of each calendar quarter when the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with the methods in OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:
0.020 lb PE/mmBtu actual heat input

Applicable Compliance Method:

The permittee may determine compliance with limitation above by multiplying the maximum hourly natural gas consumption rate (62,000 cu. ft./hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu.ft, and then dividing by the maximum heat input capacity of the boiler (62 mmBtu/hr).

If required by the Director, compliance shall be determined in accordance with the methods in OAC rule 3745-17-03(B)(9).

- 1.c Emissions Limitations:
0.47 lb PE/hr, 2.06 tons PE/yr

Applicable Compliance Method:

The permittee may determine compliance with hourly PE limitation above by multiplying the maximum hourly natural gas consumption rate (62,000 cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mmcu.ft.

If required by the Director, compliance with the hourly PE limitation shall be determined in accordance with Methods 1- 5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation is was determined by multiplying the hourly limit by 8760, and then dividing by 2000).

V. Testing Requirements (continued)

- 1.d** Emissions Limitations:
6.2 lbs NO_x/hr, 27.16 tons NO_x/yr

Applicable Compliance Method:

Compliance with the hourly limitation above may be determined by multiplying the emission factor from AP-42, Table 1.4 (revised 2/98) of 100 lbs NO_x/mm cu. ft. of natural gas by the maximum natural gas burning capacity of the emissions unit (0.062 mm cu. ft/hr).

If required by the Director, compliance with the hourly limitation shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was determined by multiplying the hourly limit by 8760, and then dividing by 2000).

- 1.e** Emissions Limitations:
5.2 lbs CO/hr, 22.78 tons CO/yr

Applicable Compliance Method:

Compliance with the hourly limitation above may be determined by multiplying the emission factor from AP-42, Table 1.4 (revised 2/98) of 84 lbs CO/mm cu. ft. of natural gas by the maximum natural gas burning capacity of the emissions unit (0.062 mm cu. ft/hr).

If required by the Director, compliance with the hourly limitation shall be determined in accordance with Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was determined by multiplying the hourly limit by 8760, and then dividing by 2000).

- 1.f** Emissions Limitations:
0.34 lbs OC/hr, 1.49 tons OC/yr

Applicable Compliance Method:

Compliance with the hourly limitation above may be determined by multiplying the emission factor from AP-42, Table 1.4 (revised 3/98) of 5.5 lbs OC/mm cu. ft of natural gas by the maximum natural gas burning capacity of the emissions unit (0.062 mm cu. ft/hr).

If required by the Director, compliance with the hourly limitation shall be determined in accordance with Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was determined by multiplying the hourly limit by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Veg Waste Dryer (P005)

Activity Description: Vegetable Waste Dryer (Rotary Dryer)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
vegetable waste dryer (rotary dryer)	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	20.4 lbs PE/hr

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance in accordance with the methods in OAC rule 3745-17-03(B)(1).
 - 1.b Emission Limitation:
20.4 lbs PE/hr

Applicable Compliance Method:
Compliance with the hourly emission limitation shall be based upon the results of emission testing conducted in accordance with the methods in OAC rule 3745-17-03(B)(10).
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - 2.a The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.
 - 2.b The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of 20.4 lbs PE/hr.
 - 2.c The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1-5 of 40 CFR, Part 60, Appendix A.
 - 2.d The test(s) shall be conducted simultaneously on all three stacks that this emissions unit is vented to and under maximum production rates unless otherwise specified or approved by the Ohio EPA, Northwest District Office.
3. 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, Northwest 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, Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northwest 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.

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, Northwest 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, Northwest District Office

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Trine Labeler #1 (R001)

Activity Description: Trine Labeler #1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
styrofoam label adhesive line (Trine labeler #1)	OAC rule 3745-21-07(G)	None, see A.II below.
	OAC rule 3745-31-05 (PTI #03-13124)	1.52 lbs organic compounds (OC)/hr, 6.66 tons OC/yr (See A.I.2.a.) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).

2. Additional Terms and Conditions

- 2.a The 1.52 lbs OC/hr and the 6.66 tons OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record and maintain each day the following information for this emissions unit:
 - 1.a the company identification for each adhesive coating employed; and
 - 1.b documentation on whether or not each adhesive coating employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which a photochemically reactive material was employed. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit, Paragraph A.1.c.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

Emissions limitations:

1.52 lbs OC/hr, 6.66 tons OC/yr

Applicable compliance method:

The permittee may determine compliance with the hourly OC emission limitation by multiplying the maximum adhesive coating usage rate (gallons/hr) by the maximum OC content of all the adhesive coatings employed (lbs/gallon) .

If required by the Director, compliance with the hourly OC emission limitation above shall be determined in accordance with Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual OC limitation shall be assumed as long as compliance with the hourly OC limitation is maintained (the annual limitation was calculated by multiplying the hourly OC limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
styrofoam label adhesive line (Trine labeler #1)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- This permit allows the use of materials (adhesive coatings) specified by the permittee in the permit to install application for this emissions unit. In addition to this emissions unit, emissions unit R002 was included in the modeling for air toxics since it emits the same pollutant and was part of the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: tetrahydrofuran

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 182.8

MAGLC (ug/m3): 14,047.6

- OAC Chapter 3745-31 requires permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

III. Monitoring and/or Record Keeping Requirements (continued)

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

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- 3.** The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- 3.a** a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- 3.b** documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- 3.c** where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Trine Labeler #2 (R002)
Activity Description: Trine Labeler #2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
styrofoam label adhesive line (Trine labeler #2)	OAC rule 3745-21-07(G)	None, see A.II below.
	OAC rule 3745-31-05 (PTI #03-13124)	1.52 lbs organic compounds (OC)/hr, 6.66 tons OC/yr (See A.I.2.a.) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).

2. Additional Terms and Conditions

- 2.a The 1.52 lbs OC/hr and the 6.66 tons OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record and maintain each day the following information for this emissions unit:
 - 1.a the company identification for each adhesive coating employed; and
 - 1.b documentation on whether or not each adhesive coating employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which a photochemically reactive material was employed. These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit, Paragraph A.1.c.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

Emissions limitations:

1.52 lbs OC/hr, 6.66 tons OC/yr

Applicable compliance method:

The permittee may determine compliance with the hourly OC emission limitation by multiplying the maximum adhesive coating usage rate (gallons/hr) by the maximum OC content of all the adhesive coatings employed (lbs/gallon) .

If required by the Director, compliance with the hourly OC emission limitation above shall be determined in accordance with Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual OC limitation shall be assumed as long as compliance with the hourly OC limitation is maintained (the annual limitation was calculated by multiplying the hourly OC limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
styrofoam label adhesive line (Trine labeler #2)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- This permit allows the use of materials (adhesive coatings) specified by the permittee in the permit to install application for this emissions unit. In addition to this emissions unit, emissions unit R002 was included in the modeling for air toxics since it emits the same pollutant and was part of the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations(s) specified in this permit was established using the Ohio EPA'S "Air Toxic Policy" and is based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: tetrahydrofuran

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 182.8

MAGLC (ug/m3): 14,047.6

- OAC Chapter 3745-31 requires permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

III. Monitoring and/or Record Keeping Requirements (continued)

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

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- 3.** The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- 3.a** a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- 3.b** documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- 3.c** where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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