State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
PICKAWAY COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 01-08467

DATE: 11/20/2003

E I DuPont De Nemours and Co
Jim Riley
800 DuPont Rd
Circleville, OH 43113

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **$ 0** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,
Michael W. Ahern
Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **CDO** **KY**

PICKAWAY COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **01-08467** FOR AN AIR CONTAMINANT SOURCE FOR **E I DUPONT DE NEMOURS AND CO**

On 11/20/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **E I DuPont De Nemours and Co**, located at **800 DuPont Rd, Circleville**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-08467:

Kapton solvent recycle heater unit 2.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417
[(614)728-3778]

DRAFT MODIFICATION OF PERMIT TO INSTALL 01-08467

Application Number:	01-08467
APS Premise Number:	0165010004
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	E I DuPont De Nemours and Co
Person to Contact:	Jim Riley
Address:	800 DuPont Rd Circleville, OH 43113

Location of proposed air contaminant source(s) [emissions unit(s)]:
800 DuPont Rd
Circleville, Ohio

Description of proposed emissions unit(s):
Kapton solvent recycle heater unit 2.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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.

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, 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.

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 recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. 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. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, 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. 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.

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.

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, 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. (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 shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

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.

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.

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.

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. 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.

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. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.

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.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping 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.)

3. 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.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. 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.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
NO_x	33.7
CO	18.0
OC	18.0
PE	0.9

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

Emissions units Power Vaporizer No. 1 (B005), Power Vaporizer No. 2 (B006), Power Vaporizer No. 3 (B007), No. 4 vaporizer (B008), No. 5 Boiler-Clayton (B012) and Casting Line Heater (P070) shall be permanently shut down and Permits to Operate shall be withdrawn before start up of the emissions units in this permit per netting agreement.

New emissions from the new installations of P080 and B014 total 59.7 TPY. Per the netting agreement as stated above, Dupont has agreed to reduce the current facility emissions by 20.05 TPY so that the total net increased NO_x emissions will be 39.7 TPY, therefore avoiding PSD review.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
B014 - Kapton solvent recycle heater unit 2, fired by natural gas and emissions from P081, 10 mmBtu/hour - modification of 01-08064 issued July 27, 2000	OAC rule 3745-31-05(A)(3)	Nitrogen oxide (NO_x) compound emissions shall not exceed 7.7 pounds/hour and 33.7 TPY. Carbon monoxide (CO) emissions shall not exceed 4.11 pounds/hour and 18.0 TPY. Organic compound (OC) emissions shall not exceed 4.11 pounds/hour and 18.0 TPY. Particulate emissions (PE) shall not exceed 0.9 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC 3745-17-10(B)(1).
	OAC rule 3745-17-07(A)(1)	Visible emissions from shack shall not exceed 20% opacity, as a 6 minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/mmBtu of actual heat input.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

1. The permittee shall burn only natural gas and collected emissions from emissions unit P081 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 or collected emissions from emissions unit P081, 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 and/or collected emissions from emissions unit P081 were burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

   a. Emission Limitations:
   NO_x emissions shall not exceed 7.7 pounds per hour.

   Applicable Compliance Method:
   This emission limitation was established by summing the calculated NO_x emissions from the combustion of the collected emissions from emissions unit P081, including dimethylacetamide (DMAC), beta-picolene (B-Pic) and acetamide, and calculated emissions from the combustion of natural gas. Emissions are calculated by multiplying the maximum amount of each pollutant present in the restricted amounts of fuel used (pound per hour or pounds per year) by the percent fuel bound nitrogen by weight (%) by the molecular weight of NO2 divided by the molecular weight of nitrogen (46/14) by the percent conversion to NO_x (%), per the PTI application received 9/28/99, as follows:

   Emissions from DMAC:
   (21 lbs DMAC/hr)(16.1%N)(46mole.wt.NO_2/14mole.wt.N) (15%conversion) = 1.67 lbs NOx/hr

   Emissions from B-Pic:
   (5 lbs B-Pic/hr)(15.1%N)(46 mole.wt.NO_2/14 mole.wt.N)(15% conversion) = 0.37 lb NO_x/hr

Emissions from Acetamide:
(30 lbs Acetamide/hr)(23.73%N)(46 mole.wt.NO2/14 mole.wt.N)(15% conversion) = 3.51 lbs NO_x/hr

Emissions from natural gas:
Based on the concentration (ppm NO_x) findings during a stack test, dated 6/25/86, on a similar source.
(20 ppm NO_x)(46 mol.wt.)(60 min per hour/359 scf/mole)(2600 scf) = 0.40 lb NO_x/hr

Total Emissions:
Total = 1.67 lbs. + 0.37 lb. + 3.51 lbs. + 0.40 lb. = 5.95 lbs. NO_x/hr

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted within 3 to 6 months after start up. Future emissions testing shall be conducted at the frequency specified in Ohio EPA Engineering Guide #16 based on the results of the initial emissions testing;

ii. The emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rates for NO_x while burning natural gas and collected emissions from emissions unit P081;

iii. The following test methods shall be employed to demonstrate compliance with the hourly allowable mass emission rate for NO_x: Methods 1 through 4 and 7, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA; and

iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity for collected emissions from emissions unit P081, unless otherwise specified or approved by the Ohio EPA, Central District Office.

b. Emission Limitations:
NO_x emissions shall not exceed 33.7 tons per year.

Applicable Compliance Method:
Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained. The annual limitation was calculated by multiplying the hourly limitation by 8760 hours/year, divided by 2000 pounds/ton.

c. Emission Limitations:

CO emissions shall not exceed 4.11 pounds per hour.

Applicable Compliance Method:
Compliance with the hourly limitation may be based on the maximum stack flow from the heater of 2600 scfm multiplied by CO stack concentration of 200 ppm (found during a stack

test, dated 6/25/86, on a similar source), multiplied by 28 (molecular weight of CO) and divided by 359 scf/lb mole, as follows:

(2600 scfm)(0.0002 lb mole/359 scf/lb mole)(28 mole.wt.CO)(60 min/hr)
= 2.4 lbs CO/hr

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

d. Emission Limitations:
CO emissions shall not exceed 18.0 tons per year.

Applicable Compliance Method:
Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained. The annual limitation was calculated by multiplying the hourly limitation by 8760 hours/year, divided by 2000 pounds/ton.

e. Emission Limitations:
OC emissions shall not exceed 4.11 pounds per hour.

Applicable Compliance Method:
Compliance with the hourly limitation may be based on summing the emissions from the P081 collected emissions, including DMAC, B-Pic, acetic acid and acetamide, and by adding the OC emissions from the combustion of natural gas and multiplying by the destruction efficiency of 99% (based on the results of stack test 1991), as follows:

Emissions from DMAC:
(21 lbs DMAC/hr)(1 - 0.99 control) = 0.21 lb OC/hr

Emissions from B-Pic:
(5 lbs B-pic/hr)(1 - 0.99 control) = 0.05 lb OC/hr

Emissions from acetic acid:
(256 lbs Acetic Acid/hr)(1 - 0.99 control) = 2.56 lbs OC/hr

Emissions from acetamide:
(30 lbs Acetamide/hr)(1 - 0.99 control) = 0.3 lb OC/hr

Emissions from natural gas:
(10,000 cu.ft. natural gas/hr)(5.8 lbs OC/MM cu.ft.[From AP-42, Table 1.4-3, (1/95)]) = 0.058 lb OC/hr

Total Emissions:
0.21 lb + 0.05 lb + 2.56 lb + 0.3 lb + 0.058 lb = 3.2 lbs OC/hr

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

f. Emission Limitations:
OC emissions shall not exceed 18.0 tons per year.

Applicable Compliance Method:
Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained. The annual limitation was calculated by multiplying the hourly limitation by 8760 hours/year, divided by 2000 pounds/ton.

g. Emissions Limitation:
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC 3745-17-03(B)(1).

h. Emissions limitation:
PE shall not exceed 0.020 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with this emission limitation may be demonstrated by the total particulate emissions from the combustion of natural gas and from the combustion of the collected organic compound emissions from emissions unit P081.

Particulate emissions from the combustion of natural gas may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 ft3/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for total particulates in natural gas combustion (7.6 lbs of

particulates/mmft3), and dividing by the maximum hourly heat input capacity of the emissions unit (10 mmBtu/hr).

Particulate emissions from the combustion of the collected organic compound emissions from emissions unit P081 may be determined by the process mass balance. 1 pound per hour is used in the process, 8.06% of the material is emitted, dividing by the maximum hourly heat input capacity of the emissions unit (10 mmBtu/hr).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9) while firing natural gas and organic compound emissions from emissions unit P081.

i. Emissions limitation:
PE shall not exceed 0.9 ton per year.

Applicable Compliance Method:
Compliance with the annual limitation shall be assumed as long as compliance with the pound per million Btu limitation is maintained. The annual limitation was calculated by multiplying this limitation by the unit's maximum input capacity of 10 mmBtu, multiplied by 8760 hours/year, divided by 2000 pounds/ton.

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, Central District Office or local air agency. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central 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, Central 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, Central District Office.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
B014 - Kapton solvent recycle heater unit 2, fired by natural gas and emissions from P081, 10 mmBtu/hour - modification of 01-08064 issued July 27, 2000	none	none

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permit to install for this emissions unit B014 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetic Acid

TLV (mg/m^3): 24.5
Maximum Hourly Emission Rate (lbs/hr): 2.56
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 48.2
MAGLC (ug/m^3): 583

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. Changes in the composition of the materials used, or the use of new materials, that would result in the emission of a 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;

b. 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

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.

2. 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":

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

None