Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

9/22/2010

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Ms. Claudia Sumedrea
Anatrace, Inc.
26111 Miles Road
Warrensville Heights, OH 44128

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0448031070
Permit Number: P0105654
Permit Type: Initial Installation
County: Lucas

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Toledo Department of Environmental Services. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
TDES; Michigan; Indiana; Canada

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 644 3020
614 | 644 3184 (fax)
www.epa.ohio.gov

Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	0448031070
Facility Name:	Anatrace, Inc.
Facility Description:	Manufacturer of biochemical detergent reagents for use in member protein studies.
Facility Address:	434 W Dussel Dr Maumee, OH 43537 Lucas County
Permit #:	P0105654, Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Toledo Blade on 08/13/2010. The comment period ended on 09/12/2010.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

a. No comments were received.

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Anatrace, Inc.

Facility ID:	0448031070
Permit Number:	P0105654
Permit Type:	Initial Installation
Issued:	9/22/2010
Effective:	9/22/2010

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Anatrace, Inc.

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Authorization

Facility ID: 0448031070
Facility Description: Manufacturer of biochemical detergent reagents for use in member protein studies.
Application Number(s): A0038569
Permit Number: P0105654
Permit Description: manufacturing process for a speciality detergent
Permit Type: Initial Installation
Permit Fee: $400.00
Issue Date: 9/22/2010
Effective Date: 9/22/2010

This document constitutes issuance to:

Anatrace, Inc.
434 W Dussel Dr
Maumee, OH 43537

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

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

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0105654
Permit Description: manufacturing process for a speciality detergent

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

Emissions Unit ID:	**P001**
Company Equipment ID:	N/A
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) 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.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.

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, 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 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.

4. 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:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Toledo Department of Environmental Services.

(2) 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 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 Toledo Department of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Toledo Department of Environmental Services every six months, 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.

(4) This permit is for an emissions unit located at a Title V facility. 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.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. 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 Toledo Department of Environmental Services 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).

6. Compliance Requirements

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

b) 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.

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

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

d) The permittee shall submit progress reports to the Toledo Department of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

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

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting 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 Toledo Department of Environmental Services.

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 Toledo Department of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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 <u>obtained before</u> 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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

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

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. 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.

19. 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.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. P001, detergent reagent manufacturing process

Operations, Property and/or Equipment Description:

detergent reagent manufacturing process including chemical synthesis, product purification in columns, product recovery, freeze dry area, bottle and flask clean-up, resin regeneration and material transfer (waste and product)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 27 tons per year as a rolling, 12-month summation emissions of hazardous air pollutants (HAP) from this emissions unit shall not exceed 27 tons per year as a rolling, 12-month summation see b)(2)a. and b)(2)b.
b.	OAC rule 3745-21-07(G)(2)	see b)(2)c.
c.	40 CFR Part 63, Subpart A (40 CFR 63.01-16)	see b)(2)d.
d.	OAC rule 3745-31-28(A) (112(g) case-by-case MACT)	see b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	This process constitutes a major source of hazardous air pollutants for which the USEPA has not promulgated a MACT determination.	

(2) Additional Terms and Conditions

a. To ensure enforceability during the first twelve calendar months of operation, following the issuance of this permit, actual emissions calculated from material usage records from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions from this emissions unit and the facility.

b. The requirements of this rule also include compliance with the requirements of 112(g) case-by-case MACT.

c. For each day during which a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), is employed the organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.

On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)b., b)(2)c., d)(1), e)(1) and f)(1)c.

d. This subpart provides applicability provisions, definitions, and other general provisions that are applicable under 40 CFR Part 63.

e. The permittee shall implement a program of work practice standards consistent with the provisions of this permit and to include the following practices:

i. the use of latching funnels and/or self closing containers for process solvent containers and satellite waste accumulation containers;

ii. the use of caps on fraction collection bottles with openings to insert the collection tubing through to control fugitive emissions;

iii. tubing insertion to the bottom of the fraction collection bottles;

iv. the use of pumps to transfer solvents from fifty-five (55) gallon drums in place of spigots and tipping of the 55-gallon drums to transfer material;

v. inspection of the transfer tubing, tubing connections and any other connections prior to commencement of product purification to confirm that no obvious leaks or release points are present;

vi. the use of a "closed" procedure to regenerate resins;

vii. the use of drip trays with a work practice standard to require expeditious removal of any collected solvent; and

viii. posting of work practice standards at appropriate locations and utilization of inspection sheets for the inspection of tubing and connections for each batch or on a daily basis dependent upon the process.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In accordance with OAC rule 3745-21-07(G)(2), for each day during which a photochemically reactive material is employed, the permittee shall collect and record the following information for each day for the operation:

a. the company identification for each liquid organic material employed;

b. the volume of each liquid organic material employed;

c. the organic compound content of each liquid organic material, in pounds per unit volume;

d. the volume of each liquid organic material removed as waste;

e. the organic compound content of each liquid organic material removed as waste, in pounds per unit volume;

f. the total organic compound emission rate for all liquid organic materials, in pounds per day, (b. x c.) - (d. x e.) for all materials as a summation, pounds;

g. the total number of hours the emissions unit was in operation; and

h. the average hourly organic compound emission rate for all liquid organic materials, i.e., (f. ÷ g.), in pounds per hour (average).

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

Note: The definition of photochemically reactive may be found in OAC rule 3745-21-01(C)(5).

(2) The permittee shall collect and record the following information on a monthly basis for the purpose of determining the annual VOC/HAP emissions:

a. the company identification for each volatile organic liquid employed;

b. the volume of each volatile organic liquid employed;

c. the VOC and HAP contents of each volatile organic liquid, in pounds per unit volume;

d. the volume of each volatile organic liquid removed as waste;

e. the VOC and HAP contents of each volatile organic liquid removed as waste, in pounds per unit volume;

f. the total VOC and HAP emission rates for all volatile organic liquids, in pounds per month, (b. x c.) - (d. x e.) for all materials as a summation; and

g. the total VOC and HAP emission rates for all volatile organic liquids, as a rolling, 12-month summation, in tons, calculated by adding the current month's total VOC and HAP emission rates from d)(2)f. to the total VOC and HAP emission rates for the preceding eleven calendar months.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

(3) Within 60 days of issuance of this permit, the permittee shall submit a written work practice standard monitoring plan to the Director. The plan must meet the requirements in paragraphs d)(3)a. through d)(3)c. The permittee shall conduct monitoring in accordance with the plan submitted to the unless comments received from the Director require an alternate monitoring scheme:

a. identify the parameter to be monitored to ensure that the control efficiency is maintained;

b. discuss why this parameter is appropriate for demonstrating ongoing compliance; and

c. identify the specific monitoring procedures.

(4) The permittee shall monitor and record each instance in which a work practice standard was not met. This includes periods of startup, shutdown, and malfunction.

e) Reporting Requirements

(1) In accordance with OAC rule 3745-21-07(G)(2), the permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the liquid organic material(s) employed exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the liquid organic material(s) employed exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

(2) The permittee shall submit annual reports that specify the total VOC and HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

(3) The permittee shall report each instance in which a work practice standard was not met. This includes periods of startup, shutdown, and malfunction. These instances are to be reported as deviations from the emission limitations.

(4) Deviations that occur during a period of startup, shutdown, or malfunction are not violations if the permittee demonstrates to the Director's satisfaction that the facility operated in accordance with 40 CFR 63.6(e)(1). The Director will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in 40 CFR 63.6(e).

(5) In accordance with OAC rule 3745-77-07(A)(3)(c) and OAC rule 3745-15-03(B) and (C), the quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(6) Unless other arrangements have been approved by the , all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

emissions of VOC from this emissions unit shall not exceed 27 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

compliance shall be determined by material balance evaluating the quantity and content of all VOC containing materials utilized in the process and the quantity and content of all VOC containing materials removed as waste. Alternate USEPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

emissions of HAP from this emissions unit shall not exceed 27 tons per year as a rolling, 12-month summation.

Applicable Compliance Method:

compliance shall be determined by material balance evaluating the quantity and content of all HAP containing materials utilized in the process and the quantity and content of all HAP containing materials removed as waste. Alternate USEPA approved test methods may be used with prior approval from the Ohio EPA.

c. Emission Limitation:

8 pounds per hour and 40 pounds per day of OC.

Applicable Compliance Method:

compliance shall be determined by daily record keeping of organic liquid usage, organic compound content of each organic liquid and operating hours per day for each unit. Manufacturer's formulation data shall be used to determine the organic compound contents. Alternate USEPA approved test methods may be used with prior approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.