Ohio Environmental Protection Agency

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

10/21/2010

Certified Mail

Facility ID: 0448010370
Permit Number: P0107012
County: Lucas

Ms. Cynthia Erchenbrecher
Tembec BTLSR Inc
P.O. BOX 2570
2112 SYLVAN AVE
TOLEDO, OH 43606

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Administrative Permit Modification

Dear Permit Holder:

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. 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 Title V permit 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 Region 5 *Via E-Mail Notification*
Toledo Department of Environmental Services

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Title V Permit
for
Tembec BTLSR Inc

Facility ID:	0448010370
Permit Number:	P0107012
Permit Type:	Administrative Permit Modification
Issued:	10/21/2010
Effective:	10/21/2010
Expiration:	5/18/2015

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Tembec BTLSR Inc

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Authorization

Facility ID: 0448010370
Facility Description:
Application Number(s): M0000894, M0000996
Permit Number: P0107012
Permit Description: Modification of emission units descriptions for boilers and insignificant emission units per USEPA review.
Permit Type: Administrative Permit Modification
Issue Date: 10/21/2010
Effective Date: 10/21/2010
Expiration Date: 5/18/2015
Superseded Permit Number: P0105419

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Tembec BTLSR Inc
2112 SYLVAN AVE.
Toledo, OH 43606

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 Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. 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. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Toledo Department of Environmental Services. 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, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.
(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) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Toledo Department of Environmental Services.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.
(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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))

6. 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))

7. 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 Standard Term and Condition A.11 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in

OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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))

9. 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))

10. 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 standard terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

11. 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))

12. 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))

13. 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:

(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 paragraph (E) of OAC rule 3745-77-03.

(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.

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:

(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.

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:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) 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.

(3) 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))

14. 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))

15. 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))

16. 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))

17. 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 emissions 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.

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

18. 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.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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))

21. 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))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

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 (i) 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, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration

of each deviation. 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.)

25. Records Retention Requirements Under State Law Only

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.

26. 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.
(Authority for term: OAC rule 3745-77-07(C))

27. 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).

28. 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.
(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) B.6

2. The following emissions units contained in this permit are subject to the applicable requirements of 40 CFR Part 63, Subparts A, OOO, and UU: P008, P009, P010, P011 and P012. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Toledo Division of Environmental Services.

3. This facility developed and registered a risk management plan pursuant to section 112(r) of the Act and, therefore, is subject to Section 112(r) of the Act.

4. The following insignificant emissions unit contained in this permit are subject to 40 CFR 63, subpart OOO: P007. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Toledo Division of Environmental Services.

5. The following insignificant emission units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emission unit. The insignificant emission units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.

   a) P007 – kettle reactor used to make formaldehyde resin; and

   b) P013 – emergency electrical generator (permit by rule)

   [Authority for Term: OAC rule 3745-77-07(A)(13)]

6. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

   a) P006 – catalyst blender;

   b) Z007 – blow off hood;

   c) Z009 – formaldehyde tank;

   d) Z010 – fuel oil tank;

   e) Z011 – PVA tank; and

   f) Z017 –cooling tower.

C. Emissions Unit Terms and Conditions

1. P003, "C" System Resin Spray Dryer

Operations, Property and/or Equipment Description:

"C" System Resin Spray Dryer

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 3745-17-07(A)(1)	Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(B)(1)	4.63 lbs/hr of particulate emissions
c.	OAC rule 3745-21-07(G)(2)	See b)(2)a.
d.	40 CFR Part 63, Subpart OOO	Exempt, existing continuous process vent.

(2) Additional Terms and Conditions

a. This emissions unit is exempted from the requirements of OAC rule 3745-21-07(G)(2) by OAC rule 3745-21-07(G)(9)(c)(iii). The only volatile liquid organic material that shall be utilized in this emissions unit is formaldehyde, which is not a photochemically reactive material as that term is defined by OAC rule 3745-21-01(C)(5)(a).

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.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record at the beginning of each shift for each day the emissions unit is in operation that there was visual confirmation that the scrubber pump is running and that the flow rate from the drain lines is adequate.

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

(2) The permittee shall collect and record the following information at every system start-up:

a. visually inspect the scrubber chamber and the orifices to ensure that they are free from blockage;

b. conduct a water flow test for the orifices, and visually confirm that they are free from blockage;

c. install the water nozzles into the orifices, and again conduct a visually confirmed water flow test;

d. visually inspect the demister bundles to ensure that they are not overloaded or ready to be changed;

e. conduct a start up test of the scrubber unit, and visually confirm that the scrubber pump is running and that the flow rate from the drain lines is adequate; and

f. visually confirm that the stack emissions are being properly controlled.

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

(3) The permittee shall perform weekly 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 eliminate the visible emissions.

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

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify each day during which the scrubber inspection form(s) indicates a problem with scrubber operation, (b)

the cause(s) of the problem and (c) the corrective action which has been or will be taken to prevent similar problems in the future.

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

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

(2) The permittee shall submit quarterly 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 eliminate the visible particulate emissions.

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

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

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:

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

b. Emission Limitation:

4.63 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1

through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) Based on stack testing performed on 6/1/1995 on P001, a permit allowable feed rate has been set as 2,350 lbs/hr; stack testing performed on 12/12/2000 on P002, a permit allowable feed rate has been set as 2824.8 lbs/hr; and based on stack testing performed on 6/2/1995 on P003, a permit allowable feed rate has been set as 2,000 lbs/hr. The average hourly feed stock rate for these emissions units shall not exceed by more than 10% the feed rate determined during the most recent emission test which demonstrated compliance with the allowable mass emission rate for particulates. Operation of this emissions unit at a feed rate greater than the compliant level is not necessarily indicative of an emission violation, but rather serves as a trigger level for additional testing and/or further investigation to establish compliance with the emission limitations. The permittee may increase the average feed rate by demonstrating compliance during an emission test, performed in accordance with the procedures and method(s) as detailed in OAC rule 3745-17-03(B)(10), at a higher average hourly feed stock rate.

2. Emissions Unit Group - "A" and "B: resin Dryers: P001, P002,

EU ID	Operations, Property and/or Equipment Description
P001	"A" System Resin Spray Dryer
P002	"B" System Resin Spray Dryer

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 3745-17-07(A)(1)	Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(B)(1)	5.14 lbs/hr of particulate emissions
c.	OAC rule 3745-21-07(G)(2)	See b)(2)a.
d.	40 CFR Part 63, Subpart OOO	Exempt, existing continuous process vent.

(2) Additional Terms and Conditions

a. This emissions unit is exempted from the requirements of OAC rule 3745-21-07(G)(2) by OAC rule 3745-21-07(G)(9)(c)(iii). The only volatile liquid organic material that shall be utilized in this emissions unit is formaldehyde, which is not a photochemically reactive material as that term is defined by OAC rule 3745-21-01(C)(5)(a).

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.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record at the beginning of each shift for each day the emissions unit is in operation that there was visual confirmation that the scrubber pump is running and that the flow rate from the drain lines is adequate.

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

(2) The permittee shall collect and record the following information at every system start-up:

a. visually inspect the scrubber chamber and the orifices to ensure that they are free from blockage;

b. conduct a water flow test for the orifices, and visually confirm that they are free from blockage;

c. install the water nozzles into the orifices, and again conduct a visually confirmed water flow test;

d. visually inspect the demister bundles to ensure that they are not overloaded or ready to be changed;

e. conduct a start up test of the scrubber unit, and visually confirm that the scrubber pump is running and that the flow rate from the drain lines is adequate; and

f. visually confirm that the stack emissions are being properly controlled.

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

(3) The permittee shall perform weekly 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 eliminate the visible emissions.

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

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify each day during which the scrubber inspection form(s) indicates a problem with scrubber operation, (b)

the cause(s) of the problem and (c) the corrective action which has been or will be taken to prevent similar problems in the future.

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

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

(2) The permittee shall submit quarterly 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 eliminate the visible particulate emissions.

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

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

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:

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

b. Emission Limitation:

5.14 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1

through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) Based on stack testing performed on 6/1/1995 on P001, a permit allowable feed rate has been set as 2,350 lbs/hr; stack testing performed on 12/12/2000 on P002, a permit allowable feed rate has been set as 2824.8 lbs/hr; and based on stack testing performed on 6/2/1995 on P003, a permit allowable feed rate has been set as 2,000 lbs/hr. The average hourly feed stock rate for these emissions units shall not exceed by more than 10% the feed rate determined during the most recent emission test which demonstrated compliance with the allowable mass emission rate for particulates. Operation of this emissions unit at a feed rate greater than the compliant level is not necessarily indicative of an emission violation, but rather serves as a trigger level for additional testing and/or further investigation to establish compliance with the emission limitations. The permittee may increase the average feed rate by demonstrating compliance during an emission test, performed in accordance with the procedures and method(s) as detailed in OAC rule 3745-17-03(B)(10), at a higher average hourly feed stock rate.

3. Emissions Unit Group - Boilers: B001, B002,

EU ID	Operations, Property and/or Equipment Description
B001	4.185 mmBtu/hr boiler, fired with natural gas, no. 2 fuel oil and/or no. 6 fuel oil, with no controls
B002	4.185 mmBtu/hr boiler, fired with natural gas, no. 2 fuel oil and/or no. 6 fuel oil, with no controls

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 3745-17-07(A)(1)	Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-10(C)(1)	0.4 pound of particulate emissions per million Btu actual heat input
c.	OAC rule 3745-18-06	Exempt, see b)(2)a.

(2) Additional Terms and Conditions

a. Fueling burning equipment which have rated heat input capacities equal to, or less than, 10 mmBtu/hr total rated capacity are exempt from the requirements of this rule.

c) Operational Restrictions

(1) The permittee shall burn only natural gas, no. 2 fuel oil and/or no. 6 fuel oil in this emissions unit.

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

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, no. 2 fuel oil and/or no. 6 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

(2) For each day during which the permittee burns no. 6 fuel oil, 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.

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

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, no. 2 fuel oil and/or no. 6 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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

(2) The permittee shall submit quarterly 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.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September),

unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

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:

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

b. Emission Limitation:

0.4 pound of particulate emissions per million Btu actual heat input

Applicable Compliance Method:

When burning natural gas, compliance may be demonstrated by dividing the particulate emission factor for natural gas combustion (1.9 lbs/mmcuft) obtained from AP-42, 5th Edition, Table 1.4-2, dated July, 1998, by the heating value of natural gas (1020 mmBtu/mmcuft).

When burning no. 2 fuel oil, compliance may be demonstrated by dividing the particulate emission factor for no. 2 fuel oil combustion (2 lbs/1000 gal) obtained from AP-42, 5th Edition, Table 1.3-1, dated September, 1998, by the heating value of no. 2 fuel oil (140 mmBtu/1000 gal).

When burning no. 6 fuel oil, compliance may be demonstrated by dividing the particulate emission factor for no. 6 fuel oil combustion (10 lbs/1000 gal) obtained from AP-42, 5th Edition, Table 1.3-1, dated September, 1998, by the heating value of no. 6 fuel oil (150 mmBtu/1000 gal).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A using the method(s) and procedures specified in OAC rule 3745-17-03(B)(9).

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

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group - Reactors: P008, P009, P010, P011, P012,

EU ID	Operations, Property and/or Equipment Description
P008	reactor used to produce liquid resin
P009	reactor used to produce liquid resin
P010	reactor used to produce liquid resin
P011	reactor used to produce liquid resin
P012	reactor used to produce liquid resin

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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
amino/phenolic resin processing unit, general provisions		
a.	OAC rule 3745-21-07(G)(2)	See b)(2)a.
b.	40 CFR 63, Subpart A (40 CFR 63.01-15)	Table 1 to Subpart OOO of 40 CFR Part 63 – Applicability of General provisions to Subpart OOO shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
c.	40 CFR 63, Subpart OOO (40 CFR 63.1400–1419) [In accordance with 40 CFR 63.1400(a), this emissions unit is a process that produces amino/phenolic resins at a facility that is a major source for hazardous air pollutants (HAPs).]	The provisions of this subpart., except as allowed under paragraph (b) of this section, apply to the owner or operator of an affected source who shall comply with the provisions of §§63.1404 through 63.1410, as appropriate. When emissions are vented to a control device or control technology as part of complying with this subpart, emissions shall be vented through a closed vent system meeting the requirements of 40 CFR part 63, subpart SS (national emission standards for closed vent systems, control devices, recovery devices).
Reactor batch process vent controlled by a condenser with spray wash system		
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		the rule.
e.	OAC rule 3745-17-11(B)(1)	1.8 lbs/hr of particulate emissions
f.	40 CFR 63, Subpart OOO (40 CFR 63.1406(a)(2), (a)(2)(ii) or (iii))	See b)(2)b.
heat exchange systems		
g.	40 CFR 63, Subpart OOO (40 CFR 63.1409(a)(1))	Exemption from the leak detection and repair requirements for existing heat exchange systems (cooling coils) operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side.
equipment leaks, controlled by equipment design and operating and maintenance programs		
h.	40 CFR 63, Subpart OOO (40 CFR 63.1410) [In accordance with 40 CFR 63.1402 and 63.1410, these requirements apply to pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors and instrumentation systems in organic HAP service.]	See b)(2)c.
storage vessels		
i.	40 CFR 63, Subpart OOO (40 CFR 63.1404(a)) [In accordance with 40 CFR 63.1404(a), these requirements apply to storage vessels with a capacity of 50,000 gallons or greater and vapor pressure of 2.45 pounds per square inch absolute (psia) or greater or has a capacity of 90,000 gallons or greater and vapor pressure of 0.15 psia or greater.]	There are no applicable requirements for existing storage vessels with a capacity of less than 50,000 gallons. See b)(2)d.

(2) Additional Terms and Conditions

a. This emissions unit is exempted from the requirements of OAC rule 3745-21-07(G)(2) by OAC rule 3745-21-07(G)(9)(c)(iii). The only volatile liquid organic material that shall be utilized in this emissions unit is formaldehyde, which is not a photochemically reactive material as that term is defined by OAC rule 3745-21-01(C)(5)(a).

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.

b. Except as otherwise provided in 40 CFR 63.1406, the permittee shall control organic HAP emissions from the reactor batch process vent by complying with either of the following:

i. reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

ii. reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

c. Except as otherwise provided in 40 CFR Part 63, Subpart OOO, the permittee shall establish a leak detection and repair program which complies with the requirements of 40 CFR Part 63, Subpart UU. These requirements are described in 40 CFR 63.1029 and 63.1410.

d. The existing storage vessels include the following:

i. formaldehyde tank (Z009) - 14,600 gallons;

ii. fuel oil tank (Z010) - 10,000 gallons;

iii. PVA tank (Z011) - 14,600 gallons;

iv. "A" system resin spray dryer (P001) tanks - 2 tanks at 1,500 gallons each;

v. "B" system resin spray dryer (P002) tanks - 2 tanks at 1,000 gallons each;

vi. "C" system resin spray dryer (P003) tanks - 2 tanks at 5,000 gallons each;

vii. liquid storage tanks - 2 tanks at 4,000 gallons each; and

viii. Wet blend tank - 1,000 gallons.

c) Operational Restrictions

(1) The permittee shall operate the condenser water wash system whenever this emissions unit is loading solid feed stock.

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

(2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart OOO - National Emission Standards for Hazardous Air Pollutant Emissions: Manufacture of Amino/Phenolic Resins, including the following sections:

63.1409(a)	Heat exchanger leak detection and repair requirements.
63.1413(a)	Establishment of parameter monitoring levels for the reactor batch process vent condenser based on a design evaluation or performance test, in compliance with the requirements of 40 CFR 63.1413 for small control devices. In compliance with Table 4 of 40 CFR Part 63, Subpart OOO, these parameter monitoring levels will include the maximum temperature of the gases exiting the condenser established to assure compliance with the emission reduction specified in b)(1)g.
63.1413(a)	Except as otherwise provided in 40 CFR Part 63 Subpart OOO, operational requirements for each control device.
63.1410	Equipment leak requirements for all equipment, as defined under 40 CFR 63.1402, that contains or contacts 5 weight-percent HAP or greater and operates 300 hours per year or more. For this emissions unit, all equipment that contacts the formalin solution will be considered to be in heavy liquid service.
40 CFR 63.1022	Requirements of 40 CFR Part 63, Subpart UU from all equipment, as defined under 40 CFR 63.1402, that contains or contacts 5 weightpercent HAP or greater and operates 300 hours per year or more. For this emissions unit, all equipment that contacts the formalin solution will be considered to be in heavy liquid service.
40 CFR 63.1024(a)	Repair of leaking equipment.
Table 4 to Subpart OOO of Part 63	Reactor batch process vent operating parameter levels.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall (a) maintain and operate and (b) record daily records that document any time periods when the condenser water wash system was not in service when the emissions unit was loading solid feed stock.

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

(2) The permittee shall maintain daily records of a low pressure alarm system which will indicate by visible and audible means that the pressure differential between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side has dropped below the required 35 psia minimum.

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

(3) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart OOO - National Emission Standards for Hazardous Air Pollutant Emissions: Manufacture of Amino/Phenolic Resins, including the following sections:

63.1413(a)	Requirement to establish parameter monitoring levels of the reactor batch process vent condenser.
40 CFR 63.1415(a), (a)(1), (b)(3)	The maintenance and operation of a reactor batch process vent condenser exit temperature monitoring device equipped with a continuous recorder and the initial and continuous compliance for storage vessels.
40 CFR 63.1416(c)	Record keeping of the daily average reactor batch process vent condenser exit temperature.
40 CFR 63.1416(b)	Start-up, shutdown, and malfunction plan:. As specified in 40 CFR 63.1416(b)(1), this plan shall require the permittee to maintain records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment, or control devices, or recovery devices, or continuous monitoring systems, or control technologies used to comply with Subpart OOO during which excess emissions (as defined in 40 CFR 63.1400(k)(4)) occur. The requirements of 40 CFR 63.1400(k)(1) through (4), shall be met during periods of start-up, shutdown, malfunction, or non-operation.
40 CFR 63.1416(d)	Record keeping for batch process vent.
40 CFR 63.1029	Leak detection and leak repair requirements for pumps, valves, connectors, agitators, pressure relief devices, and instrumentation systems.
40 CFR 63.1024(f)	Record keeping for leak repair.
40 CFR 63.1035	General pump quality assurance program requirements.

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

e) Reporting Requirements

(1) The permittee shall notify the Toledo Division of Environmental Services (TDOES) in writing of any daily record showing that the condenser water wash system was not in service when the emissions unit was loading solid feed stock. The notification shall include a copy of such record and shall be sent to the TDOES within 30 days after the event occurs.

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

(2) The permittee shall submit semiannual reports and other such notifications and reports for the pressure differential requirements (between the reactor cooling coil heat exchange system on the cooling water side and the pressure on the process side), and when applicable, the information required when the alarm system indicates the pressure differential has dropped below 35 psia.

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

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

(3) The permittee shall submit reports and other such notifications and reports via the air services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 63, Subpart OOO - National Emission Standards for Hazardous Air Pollutant Emissions: Manufacture of Amino/Phenolic Resins, including the following sections:

63.1417(f)	Semiannual reports for any exceedances of the maximum allowable daily average reactor batch process vent condenser exit temperature, and when applicable, the information required under 40 CFR 63.1416(d)(3)(ii).
40 CFR 63.1039	The permittee shall report the information specified in paragraphs (b)(1) through (b)(8) of 40 CFR 63.1039, as applicable.

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

f) Testing Requirements

(1) Compliance with the emission limitations in b) shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1))

b. Emission Limitation:

1.8 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1

through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1))

c. Emission Limitation:

reduce organic HAP emissions for the batch cycle by 83 weight percent using a condenser coil; or

reduce organic HAP emissions from the collection of all reactor batch process vents within the affected source, as a whole, to 0.0567 pound of organic HAP per 1,000 pounds of product or less for solvent-based resin production, or to 0.0057 pound of organic HAP per 1,000 pounds of product or less for non-solvent-based resin production.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon emission testing performed in accordance with the procedures specified in 40 CFR 63.1414.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.1414)

g) Miscellaneous Requirements

(1) None.