Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

1/27/2011

Certified Mail

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

Mark Ferguson
Formica Corporation - Evendale Operations
10155 Reading Rd.
Evendale, OH 45241

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1431150801
Permit Number: P0106724
Permit Type: OAC Chapter 3745-31 Modification
County: Hamilton

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 Josh Mandel," 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 Hamilton County Dept. 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
HCDOES; Indiana; Kentucky

Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	1431150801
Facility Name:	Formica Corporation - Evendale Operations
Facility Description:	Manufacturer of laminate
Facility Address:	10155 Reading Rd. Evendale, OH 45241 Hamilton County
Permit #:	P0106724, OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Cincinnati Enquirer on 12/06/2010. The comment period ended on 01/05/2011.	
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.

1. Topic: Permit Strategy Write-up
    a. Comment: Facility requested “allowable” be added to the last sentence of the source description.
    b. Response: “Allowable” was added
2. Topic: Emissions Unit P061
    a. Comment: Facility requested (f)(a): Emissions from sand line from 30747.6 tons to 28380 tons.
    b. Response: Change was made
    c. Comment: Emissions Unit P073 (b)(1)(b): Total combined emissions should be 23.72 instead of 23.68.
    d. Response: Change was made.
    e. Comment: Emissions Unit P073 (b)(1)(c): PM10 emissions should be 0.003 lb/hr instead of 0.27.

f. Response: Change was made.
g. Comment: Emissions Unit P073 (d)(5): Pressure drop range change from 3-6 inches to 1-6 inches.
h. Response: Change was made.

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Formica Corporation - Evendale Operations

Facility ID:	1431150801
Permit Number:	P0106724
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	1/27/2011
Effective:	1/27/2011

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Formica Corporation - Evendale Operations

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 9
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. P061, #5 Trimming Operation 14
2. P073, #5 Sanding Operation 20

Authorization

Facility ID: 1431150801
Facility Description: Manufacturer of laminate
Application Number(s): A0040027, A0040620
Permit Number: P0106724
Permit Description: Modification of permit #14-03784 for Trim Line 5 (P061)) to correct control device.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $1,500.00
Issue Date: 1/27/2011
Effective Date: 1/27/2011

This document constitutes issuance to:

Formica Corporation - Evendale Operations
10155 Reading Rd.
Evendale, OH 45241

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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0106724
Permit Description: Modification of permit #14-03784 for Trim Line 5 (P061)) to correct control device.

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

Emissions Unit ID:	**P061**
Company Equipment ID:	#5 Trimming Operation
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P073**
Company Equipment ID:	#5 Sanding Operation
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 Hamilton County Dept. 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 Hamilton County Dept. 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 Hamilton County Dept. 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 Hamilton County Dept. 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 Hamilton County Dept. 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 Hamilton County Dept. 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 Hamilton County Dept. 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 obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

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. 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) None.

C. Emissions Unit Terms and Conditions

1. P061, #5 Trimming Operation

Operations, Property and/or Equipment Description:

#5 Trimming Operation

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.	ORC 3704.03(T)	The cyclone control device associated with emissions unit P061 shall have a control efficiency of 99%.
b.	OAC rule 3745-31-05(D), synthetic minor to avoid PSD	The total combined particulate emissions (PE) from emissions units P061 and P073 shall not exceed 23.72 tons per year based on a rolling, 12-month summation. See c)(1).
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The particulate emissions with 10 microns and less in diameter (PM10) from emissions unit P061 shall not exceed 0.27 pound per hour and 1.18 TPY. See b)(2)a. and b)(2)c.
d.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/06	See b)(2)b.
e.	OAC rule 3745-17-11	The hourly particulate emission limitation restriction established by this rule is less stringent than the maximum calculated hourly controlled particulate emission limitation using the control efficiency established pursuant to ORC 3704.03(T) in b)(1)a.
f.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to Install P0106724 for this contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(2):

i. the PM10 emissions from emissions unit P061 shall be vented to the cyclone at all times emissions unit P061 is in operation employing a control efficiency of 99 percent;

ii. the amount of product trimmed/yr processed from emissions unit P061 shall not exceed 30747.6 tons per year; and

iii. the PM10 from emissions unit P061 shall not exceed 1.18 TPY.

c. The hourly mass emission allowable is based upon potential to emit and therefore hourly records to demonstrate compliance are not required.

c) Operational Restrictions

(1) The maximum annual production rate for emissions unit P061 shall not exceed 30747.6 tons per year based upon a rolling, 12-month summation of the production rates. The permittee has existing production records such that this emissions unit does not need to be restricted on a first year production basis.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

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

(2) The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(3) The permittee shall conduct an internal inspection of the cyclones controlling this emission unit on a quarterly basis. At a minimum, the inspection shall include the following;

a. a review of the structural integrity for all components of the cyclone;

b. inspection of the inside surfaces of the cyclone tubes for deposits or blockages; and

c. an inspection of the bottom of the cyclone tubes for plugging.

(4) The permittee shall maintain monthly records of the following information:

a. the production rate for each month;

b. the rolling, 12-month summation of the production rates; and

c. the rolling, 12-month summation of the total combined particulate emission limitation from emissions units P061 and P073.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month limitation of the production rate outlined in c)(1); and

b. all exceedances of the rolling, 12-month total combined particulate emission limitation from emissions units P061 and P073.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(2) The permittee shall submit semiannual written reports that identify:

a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

(3) The permittee shall submit an annual report that summarizes the information gathered during the quarterly cyclone inspections required in d)(3) above;

a. the date and time the inspections took place;

b. the name and job title of the employee conducting the inspections;

c. a summary of any problems found during the inspections; and

d. a listing of corrective actions taken, if any.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and cover the previous 12-month period.

(4) The permittee shall submit an annual report that summarizes the amount of PM10 emissions generated during the year.

f) Testing Requirements

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

a. Emission Limitation:

The total combined particulate emissions (PE) from emissions units P061 and P073 shall not exceed 23.72 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month particulate emission (PE) limitation may be demonstrated using the following equations:

Emissions from Trim Line

(30747.6 tons of product/year) x (0.077 ton of PE/ton of product) x (1-0.99) = 23.67 TPY PE.

Emissions from Sand Line

(28380 tons of product/year) x (0.084 ton of PE/ton of product) x (1-0.99) x (1-.998) = 0.05 TPY of PE.

The total combined particulate emissions (PE) = 23.67 TPY + 0.05 TPY = 23.72 TPY based on a rolling, 12-month summation.

b. Emission Limitation:

The PM10 emissions from emissions unit P061shall not exceed 0.27 pound per hour.

Applicable Compliance Method:

Compliance with the short term particulate matter ten microns and less in diameter limitation may be demonstrated using the following equations:

(7020 pounds of product/hr) x (0.077 pound of PE/pound of product) x (0.05 pound of PM10/pound of PE) x (1-0.99) = 0.27 lb of PM10/hr.

c. Emission Limitation:

The PM10 emissions from emissions unit P061 shall not exceed 1.18 TPY.

Applicable Compliance Method:

Compliance with the annual PM10 emission limitation may be demonstrated using the following equations:

(30747.6 tons of product trimmed/yr) x (0.0770 ton of PE/ton of product) x (0.05 ton of PM10/ton of PE) x (1-0.99) = 1.18 TPY of PM10.

d. Production Limitation:

The maximum annual production rate for emissions unit P061 shall not exceed 30747.6 tons per year based upon a rolling, 12-month summation of the production rates.

Applicable Compliance Method:

Compliance with the production limitation outlined in c)(1) shall be demonstrated by the recordkeeping requirement in d)(4).

e. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.

2. P073, #5 Sanding Operation

Operations, Property and/or Equipment Description:

#5 Sanding Operation

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.	ORC 3704.03(T)	The cyclone and baghouse control devices associated with emissions unit P073 shall have a control efficiency of 99% and 99.8%, respectively.
b.	OAC rule 3745-31-05(D), synthetic minor to avoid PSD	The total combined PE from emissions units P061 and P073 shall not exceed 23.72 tons per year based on a rolling, 12-month summation.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The particulate emissions with 10 microns and less in diameter (PM10) from emissions unit P073 shall not exceed 0.003 pound per hour and 0.01 TPY. See b)(2)a. and b)(2)c.
d.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/06	See b)(2)b.
e.	OAC rule 3745-17-11	The hourly particulate emission limitation restriction established by this rule is less stringent than the maximum calculated hourly controlled particulate emission limitation using the control efficiencies established pursuant to ORC 3704.03(T) in b)(1)a.
f.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to Install P0106724 for this contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(2):

i. The PM10 emissions from emissions unit P073 shall be vented to the cyclone and baghouse at all times emissions unit P073 is in operation;

ii. the amount of product sanded/yr processed from emissions unit P073 shall not exceed 28380 tons per year; and

iii. The PM10 from emissions units P073 shall not exceed = 0.01 TPY

c. The hourly mass emission allowable is based upon potential to emit and therefore hourly records to demonstrate compliance are not required.

c) Operational Restrictions

(1) The maximum annual production rate for emissions unit P073 shall not exceed 28380 tons per year based upon a rolling, 12-month summation of the production rates. The permittee has existing production records such that this emissions unit does not need to be restricted on a first year production basis.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

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

(2) The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(3) The permittee shall conduct an internal inspection of the cyclones controlling this emission unit on a quarterly basis. At a minimum, the inspection shall include the following;

a. a review of the structural integrity for all components of the cyclone;

b. inspection of the inside surfaces of the cyclone tubes for deposits or blockages; and

c. an inspection of the bottom of the cyclone tubes for plugging.

(4) The permittee shall maintain monthly records of the following information:

a. the production rate for each month;

b. the rolling, 12-month summation of the production rates; and

c. the rolling, 12-month summation of the total combined particulate emission limitation from emissions units P061 and P073.

(5) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1-6 inches of water.

(6) The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on daily basis. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month limitation of the production rate outlined in c)(1).

b. All exceedances of the rolling, 12-month total combined particulate emissions limitation from emissions units P061 and P073.

c. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

d. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

e. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

f. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

g. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(2) The permittee shall submit semiannual written reports that identify:

a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

(3) The permittee shall submit an annual report that summarizes the information gathered during the quarterly cyclone inspections required in d)(6) above;

a. the date and time the inspections took place;

b. the name and job title of the employee conducting the inspections;

c. a summary of any problems found during the inspections; and

d. a listing of corrective actions taken, if any.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and cover the previous 12-month period.

(4) The permittee shall submit an annual report that summarizes the amount of particulate emissions with 10 microns and less in diameter generated during the year.

f) Testing Requirements

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

a. Emission Limitation:

The total combined particulate emissions (PE) from emissions units P061 and P073 shall not exceed 23.72 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month particulate emission (PE) limitation may be demonstrated using the following equations:

<u>Emissions from Trim Line</u>

(30747.6 tons of product trimmed/year) x (0.077 ton of PE/ton of product trimmed) x (1-0.99) = 23.67 TPY of PE.

<u>Emissions from Sand Line</u>

(28380 tons of product sanded/year) x (0.084 ton of PE/ton of product sanded) x (1-0.99) x (1-0.998) = 0.05 TPY of PE.

The total combined particulate emissions (PE) = 23.67 TPY + 0.05 TPY = 23.72 TPY based on a rolling, 12-month summation.

b. Emission Limitation:

The PM10 emissions from emission unit P073 shall not exceed 0.003 pound per hour.

Applicable Compliance Method:

Compliance with the hourly PM10 emission may be demonstrated using the following equations:

(6479 pounds of product/hr) x (0.084 pound of PE/pound product) x (0.238 pound of PM10/pound PE) x (1-.99) x (1-.998) = 0.003 lb of PM10/hr.

c. Emission Limitation:

The PM10 emissions from emissions unit P073 shall not exceed 0.01 TPY.

Applicable Compliance Method:

Compliance with the annual PM10 emission limitation may be demonstrated using the following equations:

28380 tons of product sanded/year x 0.084 ton of PE/ton of product sanded x 0.238 ton of PM10/ton of PE x (1-.99) x (1-.998) = 0.01 TPY.

d. Production Limitation:

The maximum annual production rate for emissions unit P073 shall not exceed 28380 tons per year based upon a rolling, 12-month summation of the production rates.

Applicable Compliance Method:

Compliance with the production limitation outlined in c)(1) shall be demonstrated by the recordkeeping requirement in d)(4).

e. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.