



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

4/11/2011

Certified Mail

Ron Grannan
Industrial Container Services - OH, LLC
PO Box 535
Blacklick, OH 43004

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0125070213
Permit Number: P0107000
Permit Type: Initial Installation
County: Franklin

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

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 Ohio EPA DAPC, Central District Office. 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, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Industrial Container Services - OH, LLC**

Facility ID:	0125070213
Permit Number:	P0107000
Permit Type:	Initial Installation
Issued:	4/11/2011
Effective:	4/11/2011



Division of Air Pollution Control
Permit-to-Install
for
Industrial Container Services - OH, LLC

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Authorization

Facility ID: 0125070213
Facility Description: Repair shops and related services, n.e.c.
Application Number(s): A0037672
Permit Number: P0107000
Permit Description: Caustic wash operations controlled by an RTO and/or scrubber
Permit Type: Initial Installation
Permit Fee: \$2,000.00
Issue Date: 4/11/2011
Effective Date: 4/11/2011

This document constitutes issuance to:

Industrial Container Services - OH, LLC
1385 Blatt Boulevard
Gahanna Industrial Park
Blacklick, OH 43004-9523

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

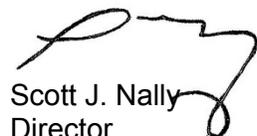
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0107000
Permit Description: Caustic wash operations controlled by an RTO and/or scrubber

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

Emissions Unit ID:	P015
Company Equipment ID:	Exterior Stripper
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P016
Company Equipment ID:	Yard Flusher
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P017
Company Equipment ID:	Progressive Preflusher
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P019
Company Equipment ID:	VOC Flusher
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 Ohio EPA DAPC, Central District Office.
 - (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 Ohio EPA DAPC, Central District Office. 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 Ohio EPA DAPC, Central District Office 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 Ohio EPA DAPC, Central District Office 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 Ohio EPA DAPC, Central District Office 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 Ohio EPA DAPC, Central District Office.
- 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 Ohio EPA DAPC, Central District Office. 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. P015, Exterior Stripper

Operations, Property and/or Equipment Description:

Exterior Stripper

- 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 3745-31-05(A)(3)	Organic Compound (OC) emissions shall not exceed 0.50 pound per hour. VOC emissions shall not exceed 2.19 tons per year. Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity.
b.	OAC rule 3745-21-07(G)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3545-31-05(A)(3).
c.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 pound per hour.
d.	OAC rule 3745-17-07(A)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3545-31-05(A)(3).

- (2) Additional Terms and Conditions
 - a. The emissions from this emissions unit shall be vented to the North and South scrubbers at all times the emissions unit is in operation.

c) Operational Restrictions

- (1) The water flow rate through the North scrubber shall be maintained at 80 gallons per minute or higher until the initial emission testing has been completed. Thereafter, the average water flow rate through the wet scrubber, for any successive 3-hour block of time when the emissions unit is in operation, shall not be below the average value observed during the most recent emission test that demonstrated the emissions unit was in compliance.
- (2) The water flow rate through the South scrubber shall be maintained at 80 gallons per minute or higher until the initial emission testing has been completed. Thereafter, the average water flow rate through the wet scrubber, for any successive 3-hour block of time when the emissions unit is in operation, shall not be below the average value observed during the most recent emission test that demonstrated the emissions unit was in compliance.
- (3) The pressure drop across the North scrubber shall be maintained within the range of 2 to 10 inches of water while the emissions unit is in operation.
- (4) The pressure drop across the South scrubber shall be maintained within the range of 1 to 5 inches of water while the emissions unit is in operation.
- (5) The pH of the North scrubber's liquor shall be maintained within the range of 5 to 10 while the emissions unit is in operation.
- (6) The pH of the South scrubber's liquor shall be maintained within the range of 5 to 10 while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across each scrubber (in pounds per square inch, gauge) and each scrubber's water flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across each scrubber and each scrubber's water flow rate on a continuous basis. The monitoring equipment shall be installed, 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 any parameter deviates from the range(s) or minimum limit(s) 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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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 the 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 and flow rate 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.

These range(s) and/or limit(s) for each pressure drop and water flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for pressure drop or water flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable emission limitations for this/these 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 a minor permit modification

The permittee shall properly install, operate, and maintain equipment to continuously monitor the pH of each scrubber's liquor during operation of this emissions unit, including periods of startup and shutdown. The

permittee shall record the pH of each scrubber's liquor on a continuous basis. The monitoring equipment shall be installed, 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 any parameter deviates from the range(s) or minimum limit(s) 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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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 the 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 and flow rate 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.

These range(s) and/or limit(s) for the pH of the wet scrubber's liquor are effective for the duration of this permit, unless revisions are requested by

the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for the PH based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate for this/these 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 a minor permit modification.

- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the material, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports of the following records:
- a. 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 North and South scrubbers.
 - b. any records of downtime (date and length of time) for the capture (collection) system and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
 - c. a log of the operating time for the capture system, scrubbers, monitoring equipment, and the emissions unit(s).
 - d. an identification of all periods of time during which the North scrubber's water flow rate was not maintained at or above the required level.
 - e. an identification of all periods of time during which the South scrubber's water flow rate was not maintained at or above the required level.
 - f. an identification of all periods of time during which the average pH of the North scrubber's liquor, when the emissions unit was in operation, was below 5 or greater than 10;
 - g. an identification of all periods of time during which the average pH of the South scrubber's liquor, when the emissions unit was in operation, was below 5 or greater than 10;

- h. an identification of all periods of time during which the pressure drop across the North scrubber, when the emissions unit was in operation, was below 2 or greater than 10;
- i. an identification of all periods of time during which the pressure drop across the South scrubber, when the emissions unit was in operation, was below 1 or greater than 15;
- j. each incident of deviation described in e)1.d through e)1.i (above) where a prompt investigation was not conducted;
- k. each incident of deviation described in e)1.d through e)1.i (above) where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and
- l. each incident of deviation described in e)1.d through e)1.i (above) 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.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

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

f) **Testing Requirements**

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
 - a. Emissions Limitation: VOC emissions shall not exceed 0.50 pound per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - b. Emissions Limitation: Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 5.

- c. Emission Limitation: Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions 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).

- d. Emissions Limitation: VOC emissions shall not exceed 2.19 tons per year.

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

- g) Miscellaneous Requirements
 - (1) None

2. P016, Yard Flusher

Operations, Property and/or Equipment Description:

Yard Flusher

- 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 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 1.43 pounds per hour.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 6.26 tons per year.</p> <p>Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity.</p>
b.	OAC rule 3745-21-07(G)(2)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3545-31-05(A)(3).
c.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 pound per hour.
d.	OAC rule 3745-17-07(A)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3545-31-05(A)(3).

(2) Additional Terms and Conditions

- a. All VOC emissions from this emissions unit captured by the air flusher (described in the PTI application as being a system of 12 vacuum hoses with hose-end collars) shall be vented to a thermal oxidizer at all times this emissions unit is in operation.

- b. The Regenerative Thermal Oxidizer controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 98%, by weight, for VOC emissions.
- c. The emissions from this emissions unit not captured by the air flusher (described in the PTI application as being a system of 12 vacuum hoses with hose-end collars) shall be vented to the North and South scrubbers at all times the emissions unit is in operation.

c) Operational Restrictions

- (1) The water flow rate through the North scrubber shall be maintained at 80 gallons per minute or higher until the initial emission testing has been completed. Thereafter, the average water flow rate through the wet scrubber, for any successive 3-hour block of time when the emissions unit is in operation, shall not be below the average value observed during the most recent emission test that demonstrated the emissions unit was in compliance.
- (2) The water flow rate through the South scrubber shall be maintained at 80 gallons per minute or higher until the initial emission testing has been completed. Thereafter, the average water flow rate through the wet scrubber, for any successive 3-hour block of time when the emissions unit is in operation, shall not be below the average value observed during the most recent emission test that demonstrated the emissions unit was in compliance.
- (3) The pressure drop across the North scrubber shall be maintained within the range of 2 to 10 inches of water while the emissions unit is in operation.
- (4) The pressure drop across the South scrubber shall be maintained within the range of 1 to 5 inches of water while the emissions unit is in operation.
- (5) The pH of the North scrubber's liquor shall be maintained within the range of 5 to 10 while the emissions unit is in operation.
- (6) The pH of the South scrubber's liquor shall be maintained within the range of 5 to 10 while the emissions unit is in operation.
- (7) The minimum combustion temperature of the Regenerative Thermal Oxidizer shall be maintained at 1,400 degrees Fahrenheit or higher until the initial emissions' testing has been completed. Thereafter, the average temperature of the exhaust gases from the combustion chamber of the thermal incinerator, for any successive 3-hour period of time, shall not be below the average temperature observed during the most recent emission test that demonstrated the emissions unit was in compliance. The combustion temperature of the Regenerative Thermal Oxidizer and the average temperature of the combustion chamber of the Regenerative Thermal Oxidizer shall be measured at the same location.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across each scrubber (in pounds per square inch, gauge) and each scrubber's water flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across each scrubber and each scrubber's water flow rate on a continuous basis. The monitoring equipment shall be installed, 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 any parameter deviates from the range(s) or minimum limit(s) 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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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 the 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 and flow rate 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.

These range(s) and/or limit(s) for each pressure drop and water flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for pressure drop or water flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable emission limitations for this/these 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 a minor permit modification

The permittee shall properly install, operate, and maintain equipment to continuously monitor the pH of each scrubber's liquor during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pH of each scrubber's liquor on a continuous basis. The monitoring equipment shall be installed, 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 any parameter deviates from the range(s) or minimum limit(s) 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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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 the 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 and flow rate 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.

These range(s) and/or limit(s) for the pH of the wet scrubber's liquor are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for the PH based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate for this/these 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 a minor permit modification.

- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the material, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.
- (3) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the Regenerative Thermal Oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations. This monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.

- (4) The permittee shall collect and record the following Regenerative Thermal Oxidizer information for each operating day:
- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
 - b. all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was below the average temperature observed during the most recent emission test that demonstrated that the emissions unit was in compliance; and
 - c. prior to the initial compliance demonstration, all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was less than 1400 degrees;
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports of the following records for the North and South scrubbers:
- a. 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 North and South scrubbers.
 - b. any records of downtime (date and length of time) for the capture (collection) system and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
 - c. a log of the operating time for the capture system, scrubbers, monitoring equipment, and the emissions unit(s).
 - d. an identification of all periods of time during which the North scrubber's water flow rate was not maintained at or above the required level.
 - e. an identification of all periods of time during which the South scrubber's water flow rate was not maintained at or above the required level.
 - f. an identification of all periods of time during which the average pH of the North scrubber's liquor, when the emissions unit was in operation, was below 5 or greater than 10;
 - g. an identification of all periods of time during which the average pH of the South scrubber's liquor, when the emissions unit was in operation, was below 5 or greater than 10;

- h. an identification of all periods of time during which the pressure drop across the North scrubber, when the emissions unit was in operation, was below 2 or greater than 10;
- i. an identification of all periods of time during which the pressure drop across the South scrubber, when the emissions unit was in operation, was below 1 or greater than 15;
- j. each incident of deviation described in e)1.d through e)1.i (above) where a prompt investigation was not conducted;
- j. each incident of deviation described in e)1.d through e)1.i (above) where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and
- k. each incident of deviation described in e)1.d through e)1.i (above) 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.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Title V Fee Emission Report to be submitted by April 15 of each year.
- (3) The permittee shall submit deviation (excursion) reports which include the following information for the Regenerative Thermal Oxidizer:
 - a. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.
 - b. an identification of all successive 3-hour periods of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature observed during the most recent performance test that demonstrated the emissions unit was in compliance, or below 1,400 degrees Fahrenheit until initial emissions testing has been completed;

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

f) Testing Requirements

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

- a. Emissions Limitation: VOC emissions shall not exceed 6.26 tons per year.

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

- b. Emissions Limitation: Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 5. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- c. Emission Limitation: Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions 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).

- d. Emission Limitations: VOC emissions shall not exceed 1.43 pounds per hour; The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

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

i. The emission testing shall be conducted within 425 days after issuance of this permit.

ii. The following test method(s) shall be employed to determine the mass emission rate(s) for VOC and overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

iii. The test(s) shall be conducted while this emissions unit and P019 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

The overall control efficiency of the control equipment serving this emissions unit shall be demonstrated based upon the results of the control efficiency tests specified above. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Section F)1.d.ii of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

g) Miscellaneous Requirements

- (1) The permittee shall comply with the following compliance plan and schedule:

Milestone Activity	Milestone Date
a. Award Contracts for emission control system or process modifications; or issue orders for the purchase of component parts to accomplish emission control equipment and /or process modification by	Within 120 days of Ohio EPA's Issuance of this PTI.
b. Initiate on site construction and/or installation of emission control equipment and/or process changes as described in the Air permit to install application submitted on October 10 th , 2010	Within 210 days of Ohio EPA's Issuance of this PTI.
c. Complete on site construction and or installation of Emission control equipment and/or process change	Within 260 days of Ohio EPA's Issuance of this PTI.
d. Submit Intent to test notification	Within 395 days of Ohio EPA's Issuance of this PTI.
e. Achieve and demonstrate Final Compliance	Within 425 days of Ohio EPA's Issuance of this PTI.
f. Submit Final Test report	Within 455 days of Ohio EPA's Issuance of this PTI.

3. P017, Progressive Preflusher

Operations, Property and/or Equipment Description:

Progressive Preflusher

- 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 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 0.50 pound per hour.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 2.19 tons per year.</p> <p>Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity.</p>
b.	OAC rule 3745-21-07(G)(2)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3545-31-05(A)(3).
c.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 pound per hour.
d.	OAC rule 3745-17-07(A)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3545-31-05(A)(3).

- (2) Additional Terms and Conditions
 - a. The emissions from this emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.

b. The scrubber controlling emissions from this emissions unit shall be equipped with a mist eliminator.

c) Operational Restrictions

- (1) The water flow rate through the wet scrubber shall be maintained at 10 gallons per minute or higher until the initial emission testing has been completed. Thereafter, the average water flow rate through the wet scrubber, for any successive 3-hour block of time when the emissions unit is in operation, shall not be below the average value observed during the most recent emission test that demonstrated the emissions unit was in compliance.
- (2) The pressure drop across the wet scrubber shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.
- (3) The pressure drop across the mist eliminator shall be maintained within the range of 2 to 5 inches of water while the emissions unit is in operation.
- (4) The pH of the wet scrubber's liquor shall be maintained within the range of 5 to 10 while the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the wet scrubber (in pounds per square inch, gauge) and the wet scrubber's water flow rate (in gallons per minute) during operation of this emissions unit, including

periods of startup and shutdown. The permittee shall record the pressure drop across the wet scrubber and the wet scrubber's water flow rate on a continuous basis. The monitoring equipment shall be installed, 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 any parameter deviates from the range(s) or minimum limit(s) 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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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 the 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 and flow rate 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.

These range(s) and/or limit(s) for the wet scrubber's pressure drop and water flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for pressure drop or water flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable emission limitations for this/these 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 a minor permit modification

The permittee shall properly install, operate, and maintain equipment to continuously monitor the pH of the wet scrubber's liquor during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pH of the wet scrubber's liquor on a continuous basis. The monitoring equipment shall be installed, 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 any parameter deviates from the PH limit(s) 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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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 the 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 and flow rate 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.

These range(s) and/or limit(s) for the pH of the wet scrubber's liquor are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for the PH based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate for this/these 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 a minor permit modification.

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the mist eliminator (in pounds per square inch, gauge) during operation of this/these emissions unit(s), including periods of startup and shutdown. The permittee shall record the pressure drop across the mist eliminator on a continuous basis. The monitoring equipment shall be installed, 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 any parameter deviates from the range(s) or minimum limit(s) 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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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 the 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 and flow rate 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.

These range(s) and/or limit(s) for the pressure drop across the mist eliminator are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for the pressure drop based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this/these 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 a minor permit modification.

- (3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the material, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports of the following records for the wet scrubber:
- a. 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 wet scrubber.
 - b. any records of downtime (date and length of time) for the capture (collection) system and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
 - c. a log of the operating time for the capture system, scrubbers, monitoring equipment, and the emissions unit(s).
 - d. an identification of all periods of time during which the wet scrubber's water flow rate was not maintained at or above the required level.
 - e. an identification of all periods of time during which the pH of the wet scrubber's liquor, when the emissions unit was in operation, was below 5 or greater than 10;

- f. an identification of all periods of time during which the pressure drop across the wet scrubber, when the emissions unit was in operation, was below 2 or greater than 5;
- g. an identification of all periods of time during which the pressure drop across the mist eliminator, when the emissions unit was in operation, was below 2 or greater than 5;
- h. each incident of deviation described in e)1.e through e)1.g (above) where a prompt investigation was not conducted;
- i. each incident of deviation described in e)1.e through e)1.g (above) where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and
- j. each incident of deviation described in e)1.e through e)1.g (above) 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.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

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

f) **Testing Requirements**

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
 - a. Emissions Limitation: VOC emissions shall not exceed 0.50 pound per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - b. Emissions Limitation: Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 5.

- c. Emission Limitation: Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions 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).

- d. Emissions Limitation: VOC emissions shall not exceed 2.19 tons per year.

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

- g) Miscellaneous Requirements
 - (1) None

4. P019, VOC Flusher

Operations, Property and/or Equipment Description:

VOC flusher

- 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 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 1.43 pounds per hour.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 6.26 tons per year.</p> <p>Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity.</p>
b.	OAC rule 3745-21-07(G)(2)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3545-31-05(A)(3).
c.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 pound per hour.
d.	OAC rule 3745-17-07(A)	The emission limitation specified in this rule is less stringent than the emissions limitation established pursuant to OAC rule 3545-31-05(A)(3).

- (2) Additional Terms and Conditions
 - a. All VOC emissions from this emissions unit shall be vented to a thermal oxidizer at all times this emissions unit is in operation.

- b. The Regenerative Thermal Oxidizer controlling VOC emissions from this emissions unit shall operate with a minimum control efficiency of 98%, by weight, for VOC emissions.
- c) Operational Restrictions
 - (1) The minimum combustion temperature of the Regenerative Thermal Oxidizer shall be maintained at 1,400 degrees Fahrenheit or higher until the initial emissions' testing has been completed. Thereafter, the average temperature of the exhaust gases from the combustion chamber of the thermal incinerator, for any successive 3-hour period of time, shall not be below the average temperature observed during the most recent emission test that demonstrated the emissions unit was in compliance. The combustion temperature of the Regenerative Thermal Oxidizer and the average temperature of the combustion chamber of the Regenerative Thermal Oxidizer shall be measured at the same location.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the material, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.
 - (2) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the Regenerative Thermal Oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations. This monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.
 - (3) The permittee shall collect and record the following Regenerative Thermal Oxidizer information for each operating day:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
 - b. all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was below the

average temperature observed during the most recent emission test that demonstrated that the emissions unit was in compliance; and

- b. prior to the initial compliance demonstration, all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was less than 1400 degrees;

- e) Reporting Requirements
 - (1) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Title V Fee Emission Report to be submitted by April 15 of each year.
 - (2) The permittee shall submit deviation (excursion) reports which include the following information for the Regenerative Thermal Oxidizer:
 - a. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.
 - b. an identification of all successive 3-hour periods of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature observed during the most recent performance test that demonstrated the emissions unit was in compliance, or below 1,400 degrees Fahrenheit until initial emissions testing has been completed;

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- f) Testing Requirements
 - (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
 - a. Emissions Limitation: VOC emissions shall not exceed 6.26 tons per year.

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

- b. Emissions Limitation: Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 5. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- c. Emission Limitation: Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions 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).

- d. Emission Limitations: VOC emissions shall not exceed 1.43 pounds per hour; The permittee shall control VOC emissions from this emissions unit through the use of a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

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

- i. The emission testing shall be conducted within 425 days after issuance of this permit.
- ii. The following test method(s) shall be employed to determine the mass emission rate(s) for VOC and overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iii. The test(s) shall be conducted while this emissions unit and P016 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

The overall control efficiency of the control equipment serving this emissions unit shall be demonstrated based upon the results of the control efficiency tests specified above. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in

Section F)1.d.ii of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

g) Miscellaneous Requirements

- (1) The permittee shall comply with the following compliance plan and schedule:

Milestone Activity	Milestone Date
a. Award Contracts for emission control system or process modifications; or issue orders for the purchase of component parts to accomplish emission control equipment and /or process modification by	Within 120 days of Ohio EPA's Issuance of this PTI.
b. Initiate on site construction and/or installation of emission control equipment and/or process changes as described in the Air permit to install application submitted on October 10 th , 2010	Within 210 days of Ohio EPA's Issuance of this PTI.

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| c. Complete on site construction and or installation of Emission control equipment and/or process change | Within 260 days of Ohio EPA's Issuance of this PTI. |
| d. Submit Intent to test notification | Within 395 days of Ohio EPA's Issuance of this PTI. |
| e. Achieve and demonstrate Final Compliance | Within 425 days of Ohio EPA's Issuance of this PTI. |
| f. Submit Final Test report | Within 455 days of Ohio EPA's Issuance of this PTI. |