

Synthetic Minor Determination and/or Netting Determination

Permit To Install: 02-22183

A. Source Description

Noveon is located at 550 Moore Road, Avon Lake, Lorain County, Ohio. Noveon manufactures plastics materials and resins and operates under SIC code 2821. This permit will modify PTI 02-13130 for emissions unit P007. The permit is requested as Noveon has closed a facility in New Jersey and consequently will make a new product in existing emissions unit P007. This permit will allow for an emissions increase of 25% over the next 5 years at emissions unit P007 due to the new product.

B. Facility Emissions and Attainment Status

Lorain County is designated as nonattainment for ozone. Noveon is permitted as a synthetic minor facility for VOC and HAPs. Before this permit, the facility potential to emit is 84.21 tpy VOC, 34.56 tpy PE, 1.45 tpy SO₂, 45.20 tpy CO, 22.11 tpy NO_x, 2.14 tpy NH₃, 16.57 tpy combined HAPs and the highest single HAP, ethyl acrylate is 4.28 tpy.

C. Source Emissions

Emissions unit P007 manufactures a variety of plastics materials and resins in a batch process; each batch lasting 30-50 hours. P007 has a variety of control equipment. OC control equipment consists of a thermal oxidizer at egress point 52, a condenser at egress point 9, and a barometric condenser/surface condenser tandem at egress point 47. There is an ammonia scrubber at egress point 28 and a caustic scrubber at egress point 6 for sulfur dioxide. There is a baghouse at egress point 61 and another at egress point 62. There are uncontrolled OC emissions at egress points 8, 15, 16, 18, 24, 25, 45, 50, 51, 54, 56, 57, 59, 60, 63 and 64.

The allowable emissions for P007 will be based upon the use of the above control equipment and a production restriction of 28.34 million dry pounds, per rolling 12 month period. This permit will increase potential VOC emissions by 2.34 tpy to 86.55 tpy. Potential combined HAP will increase by 0.21 tpy to 16.78 tpy. Ethyl acrylate will remain the highest single HAP, with potential emissions of 4.28 tpy. All other pollutants will remain the same.

D. Conclusion

This permit will allow for the production of a new product at emissions unit P007. The permit will restrict production at P007 to 28.34 million dry pounds per rolling, 12-months, and will continue to restrict potential VOC and HAP emissions to below major source thresholds. Potential PE, SO₂, CO, NO_x and ammonia emissions will be unchanged.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
LORAIN COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

Application No: 02-22183

Fac ID: 0247030004

DATE: 8/24/2006

Noveon, Inc.
John Uptmor
550 Moore Rd
Avon Lake, OH 440120134

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NEDO

LORAIN COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 02-22183 FOR AN AIR CONTAMINANT SOURCE FOR
Noveon, Inc.**

On 8/24/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Noveon, Inc.**, located at **550 Moore Rd, Avon Lake, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-22183:

Modification to P007, Acrylic Polymer Production Process.

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

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-22183

Application Number: 02-22183
Facility ID: 0247030004
Permit Fee: **To be entered upon final issuance**
Name of Facility: Noveon, Inc.
Person to Contact: John Uptmor
Address: 550 Moore Rd
Avon Lake, OH 440120134

Location of proposed air contaminant source(s) [emissions unit(s)]:
**550 Moore Rd
Avon Lake, Ohio**

Description of proposed emissions unit(s):
Modification to P007, Acrylic Polymer Production Process.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

Noveon, Inc.

Facility ID: 0247030004

PTI Application: 02-22183

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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

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

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

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

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	0.78
VOC	15.35
OC	17.87
SO ₂	0.90
Combined HAPs	1.54

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (P007) - Specialty Additives Manufacturing Operations

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 0.37 lb per hour and 0.78 ton per year.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 0.20 lb per hour and 0.90 ton per year.</p> <p>Organic compounds (OC) emissions shall not exceed 3.55 lbs per hour and 17.87 tons per year.</p> <p>See sections A.2.b and A.2.c below.</p>
OAC rule 3745-31-05(C)	<p>Volatile organic compounds (VOC) emissions shall not exceed 3.41 lbs per hour and 15.35 tons per rolling, 12 month period.</p> <p>Emissions of combined hazardous air pollutants (HAP) shall not exceed 257 lbs per month and 1.54 tons per rolling, 12 month period.</p>
OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06(E)(2)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
OAC rule 3745-21-07(G)(2)	OC emissions from this emissions unit shall be reduced by at least 85%.

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OAC rule 3745-21-07(G)(6)(a)

OAC rule 3745-21-07(G)(6)(a)	The thermal incinerator used to comply with this requirement shall oxidize at least 90% of the OC emissions, by weight, to carbon dioxide.
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2. Additional Terms and Conditions

- 2.a** This emissions unit consists of the acrylic polymer operations located in building 437, including raw material storage tanks, catalyst tanks, monomer day tanks, premix tanks, reactors/strippers, condensers, receivers, solvent recovery systems, vacuum jets, condensers, scrubbers and product storage tanks. OC control equipment consists of a thermal oxidizer at egress point 52, a condenser at egress point 9 and a barometric condenser/surface condenser tandem at egress point 47. There is an ammonia scrubber at egress point 28 and a caustic scrubber at egress point 6 for sulfur dioxide. There is a baghouse at egress point 61 and another at egress point 62. There are uncontrolled OC emissions at egress points 8, 15, 16, 18, 24, 25, 45, 50, 51, 54, 56, 57, 59, 60, 63 and 64.
- 2.b** The OC emissions limitations of 3.55 pounds per hour and 17.87 tons per year were established based upon the total pounds per year, 28.34 million (dry pounds) maximum annual production, and potential to emit calculations performed by the permittee utilizing "Emissions Master" modeling software, TANKS4.0, and previously existing emission factors from the P007 Acrylic Polymers present operations.
- 2.c** The allowable OC emissions of 17.87 tons per year include acetone, which is used for cleanup. Emissions from cleanup materials were established using Emission Master 7.3.1. Each cleaning of the emissions unit shall be performed in accordance with the procedures and assumptions used in the Emissions Master model.

B. Operational Restrictions

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the production rate upon issuance of this permit. The maximum annual production rate for this emissions unit shall not exceed 28.34 million dry pounds, based upon a rolling, 12 month summation of the production rates.

C. Monitoring and/or Record keeping Requirements

Emissions Unit ID: **P007**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within Zone 1 of the thermal oxidizer (egress point 52) when the emissions unit is in operation, including startup and shutdown. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals and good management practices as they apply with this process and with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average combustion temperature within the thermal incinerator, each of the eight, 3-hour blocks of time during each day of operation. These records shall be maintained at the facility for a period of three years.

Whenever the 3-hour block temperature deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and 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 temperature range specified below, 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 description of the time (in minutes) during which there was a deviation, the temperature readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range of the combustion temperature within Zone 1 of the thermal oxidizer (egress point 52) for all 3-hour blocks of time is not more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the range based upon information obtained during future OC emissions testing that demonstrate compliance with the allowable OC emission rate for this emissions unit. In addition, approved revisions to the range will

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not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the permit by means of an administrative modification.

2. The permittee shall operate and maintain equipment to continuously monitor and record the pressure drop across both baghouses (egress points 61 and 62) while the emissions unit is in dry product operations, including startup and shutdown. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals and good management practices as they apply to this process. The permittee shall record the pressure drop across each baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and 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 pressure drop range specified below, 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 description of the time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across each baghouse is 0.4 to 10.0 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the range based upon information obtained during future particulate emissions testing that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the permit by means of an administrative modification.

Emissions Unit ID: **P007**

3. 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 both baghouses. 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 location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

At any time the permittee observes visible emissions from either baghouse, the permittee shall monitor the visible emissions for a minimum period of 10 minutes in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22 and record the results in an operations log.

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the scrubber condenser (egress point 47) and the condenser (egress point 9) when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy of each thermocouple, monitor and recorder shall be guaranteed by the manufacturer to be within plus or minus 1 percent of the temperature being measured or plus or minus 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturers recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect, calculate and record the average temperature of the exhaust gases from the condenser for each of the eight, 3-hour blocks of time during each day of operation.

Whenever the monitored value for the temperature deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and 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 temperature range specified below, unless the

Emissions Unit ID: **P007**

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 description of the time (in minutes) during which there was a deviation, the temperature readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range of the exhaust gases from the scrubber condenser (egress point 47) and the condenser (egress point 9) for all 3-hour blocks of time when the emissions unit was in operation, is not more than 11 degrees Fahrenheit above the average temperature recorded during the most recent emission test that demonstrated the emissions unit to be in compliance.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the range based upon information obtained during future OC emissions testing that demonstrate compliance with the allowable OC emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the permit by means of an administrative modification.

5. The permittee shall properly operate and maintain equipment to monitor the scrubber water flow rate and the pH for the caustic scrubber (egress point 6) and the ammonia scrubber (egress point 28) while the emissions unit is in operation. The monitoring devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall collect and record the following information for each scrubber each day:

- a. the scrubber water flow rate, in gallons per minute; and
- b. the pH of the scrubber liquor.

Whenever the monitored value for the water flow rate and/or pH of the scrubber liquor deviates from the ranges specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the dates(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

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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 ranges specified below, 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 description of the time (in minutes) during which there was a deviation, the water flow rate and scrubber liquor pH readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The water flow rate from the caustic scrubber (egress point 6) liquor shall be no less than 1 gpm while the emissions unit is in operation. The pH of the scrubber liquor shall be continuously maintained between 3 and 9 at all times while the emissions unit is in operation

The water flow rate from the ammonia scrubber (egress point 28) liquor shall be no less than 3.5 gpm while the emissions unit is in operation. The pH of the scrubber liquor shall be continuously maintained between 6 and 8 at all times while the emissions unit is in operation.

These ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northeast District Office. The permittee may request revisions to the ranges based upon information obtained during future emissions testing that demonstrate compliance with the allowable emission rates for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the permit by means of an administrative modification.

6. The permittee shall maintain monthly records of the following information:
 - a. the production rate of each product; and
 - b. the rolling, 12 month summation of the production rates.
7. 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. The records shall be retained on site for three years and may be retained off site for the remaining two years. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip chart or

electronic data records and recordings.

8. The permittee shall develop emission factors for the amount of uncontrolled VOC, OC, HAP, PE and SO₂ generated, either for each final product generated or for each batch run in this emissions unit. The permittee shall also develop factors to describe the amount of each pollutant captured and controlled. The uncontrolled emission factors shall be in units of lb of uncontrolled pollutant generated per lb or ton of final product generated, or per batch run. The capture/control factors shall be in percent, by weight.

The permittee shall submit the uncontrolled emissions factors and the capture/control factors generated for all products produced in this emissions unit. The factors generated shall be computed based on calculation methods approved by the Ohio EPA. The specific methodology used to calculate each factor, example calculations using the approved methodology, and the generated factors shall be submitted within 180 days after final issuance of this permit and shall be subject to the review and approval of the Ohio EPA, Northeast District Office. Detailed calculations of all factors shall be kept on site and available for Ohio EPA review.

If necessary, the permittee shall conduct emission testing, at the request of the Northeast District Office, during the production of a specific final product to confirm the accuracy of the emission factors.

D. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the recorded parameter(s) specified herein was outside the acceptable range;
 - i. each 3-hour block of time when the combustion temperature within Zone 1 of the thermal oxidizer (egress point 52) was outside the acceptable range;
 - ii. each period of time when the pressure drop across either baghouse (egress points 61 and 62) was outside the acceptable range;
 - iii. each 3-hour block of time when the exhaust gases from the scrubber condenser (egress point 47) and/or the condenser (egress point 9) were outside the acceptable range; and

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- iv. each period of time when the pH and/or the water flow rate from the caustic scrubber (egress point 6) and the ammonia scrubber (egress point 28) was outside the acceptable range;
- b. an identification of each incident of deviation described above where a prompt investigation was not conducted; and
- c. an identification of each incident of deviation described above where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e. postmarked) by January 31, April 30, July 31 and October 31 of each year' and each report shall cover the previous calendar quarter.

- 2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stacks serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month periods.
- 3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month limitation of the production rate. This report shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
- 4. Each year, the permittee shall submit an annual report, by April 30, for the preceding calendar year. Each annual report shall specify the annual OC emissions and annual production for this emissions unit, in tons and/or pounds.

E. Testing Requirements

- 1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - 3.41 lbs VOC per hour and 15.35 tons per rolling, 12 months
 - 257 lbs HAP per month and 1.54 tons per rolling, 12 months
 - 3.55 lbs OC per hour and 17.87 tons OC per year
 - 0.37 lb PE per hour and 0.78 ton per year

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0.20 lb SO₂ per hour and 0.90 ton per year

Applicable Compliance Method:

For up to six months after the effective date of this permit compliance with the hourly/monthly limitations shall be determined based upon the production records specified in section C.6 and the calculations performed by the permittee utilizing the Emissions Master 7.3.1 modeling software and TANKS4.0 program.

Within six months of the effective date of this permit and thereafter, compliance with the hourly/monthly emission limitations shall be determined based upon the production records specified in section C.6 and the uncontrolled emission factors and capture/control factors generated as specified in section C.8.

Compliance with the rolling, 12-month emission limitations shall be determined based upon the production records specified in section C.6.b and using the uncontrolled emission factors and capture/control factors generated as specified in section C.8 for each 12 month period and multiplying by 1 ton/2000 lbs.

Compliance with the annual emission limitations shall be determined based upon summations of the monthly production records specified in section C.6.a for each calendar year and using the uncontrolled emission factors and capture/control factors generated as specified in section C.8 and multiplying by 1 ton/2000 lbs.

Records may be computerized, i.e. from CHAMPS or SAP for production levels and data logs from the distributed control system (DCS) monitoring and daily shift logs.

If required, emission tests shall be performed in accordance with the requirements specified in OAC rule 3745-15-04.

b. Emission Limitation:

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

Applicable Compliance Method:

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

Issued: To be entered upon final issuance

c. Emission Limitation:

OC emissions reduced by at least 85%, by weight
destruction efficiency through thermal oxidizer at least 90%, by weight

Applicable Compliance Method:

If required, emission tests shall be performed in accordance with the requirements specified in OAC rule 3745-15-04.

Any compliance testing for OC shall be performed using Method 204 and Method 25 or Method 25A of 40 CFR Part 60, Appendix A, as appropriate. Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA, Northeast District Office.

Any testing conducted shall be performed while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

No later than 30 days prior to the proposed test date(s) the permittee shall submit and "Intent to Test" (ITT) notification to the Ohio EPA, Northeast District Office. The ITT notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s), and the permit(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's refusal to accept the results of the emission test(s).

F. Miscellaneous Requirements

This permit replaces PTI 02-13130 for this emissions unit.