



Environmental Protection Agency

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

11/15/2011

John Wharton  
United Initiators, Inc.  
555 Garden Street  
Elyria, OH 44035

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0247040079  
Permit Number: P0085286  
Permit Type: Renewal  
County: Lorain

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, [www.epa.ohio.gov/dapc](http://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: Ohio EPA-NEDO





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
United Initiators, Inc.**

Facility ID:	0247040079
Permit Number:	P0085286
Permit Type:	Renewal
Issued:	11/15/2011
Effective:	11/15/2011
Expiration:	11/15/2021





Division of Air Pollution Control
Permit-to-Install and Operate
for
United Initiators, Inc.

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## Authorization

Facility ID: 0247040079  
Application Number(s): A0015920  
Permit Number: P0085286  
Permit Description: PTIO Renewal permit for liquid and solid organic peroxide manufacturer. This permit includes corrections to emissions limitations.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 11/15/2011  
Effective Date: 11/15/2011  
Expiration Date: 11/15/2021  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

United Initiators, Inc.  
555 Garden Street  
Elyria, OH 44035

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

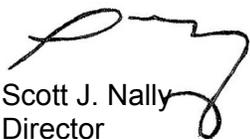
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0085286

Permit Description: PTIO Renewal permit for liquid and solid organic peroxide manufacturer. This permit includes corrections to emissions limitations.

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

- Emissions Unit ID: B005**  
Company Equipment ID: Boiler 2  
Superseded Permit Number: 02-19832  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P006**  
Company Equipment ID: Bldg 11  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P010**  
Company Equipment ID: Bldg 14  
Superseded Permit Number: 02-12889  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P011**  
Company Equipment ID: WWTP  
Superseded Permit Number: 02-0572  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P012**  
Company Equipment ID: Bldg 31  
Superseded Permit Number: 02-22284  
General Permit Category and Type: Not Applicable

## **A. Standard Terms and Conditions**

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile 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).

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

## **B. Facility-Wide Terms and Conditions**

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.

## **C. Emissions Unit Terms and Conditions**



1. B005, Boiler 2

Operations, Property and/or Equipment Description:

4.2 mm btu/hr natural gas and comparable fuels boiler (waste products from facility processes)

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-05(A)(3) with limitations for visible emissions, particulate emissions, carbon monoxide, and nitrogen oxide. Row b: OAC rule 3745-17-07(A) with a note that its limitation is less stringent than rule 3745-31-05(A)(3).

c	OAC rule 3745-17-10(C)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
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(2) Additional Terms and Conditions

- a. The fuels burned in this emissions unit are not considered hazardous waste provided all of the requirements of OAC rule 3745-51-38 are met.
- b. The feed rate of fuels, other than natural gas, shall not exceed 8 gallons/hour.

c) Operational Restrictions

- (1) The permittee shall properly operate and maintain equipment to monitor the comparable fuel flow rate. The monitoring device(s) and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

## e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Ohio EPA Northeast District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall submit deviation (excursion) reports for any day the fuel feed rate for comparable fuels exceeded 8 gallons/day. These reports shall be submitted with 45 days of any exceedance.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term **d)(1)**:
  - a. any day which the fuel feed rate for comparable fuels exceeded 8 gals/day;
  - b. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.

## f) Testing Requirements

- (1) Compliance with the Emission Limitations specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation  
Visible particulate emissions shall not exceed 10% opacity as a 3-minute average.  
  
Applicable Compliance Method  
If required, compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9, and the modifications listed in OAC rule 3745-17-03(B)(3).
  - b. Emission Limitation  
PE shall not exceed 0.21 lb/hr and 0.92 tpy.  
  
Applicable Compliance Method  
If required, compliance with the short term limit shall be demonstrated in accordance with Method 5 of 40 CFR Part 60, Appendix A.

Compliance with the short term limit demonstrates compliance with the annual limitation.

c. Emission Limitation

CO emissions shall not exceed 0.35 lb/hr and 1.53 tpy.

Applicable Compliance Method

If required, compliance with the short term limit shall be demonstrated in accordance with Method 10 of 40 CFR Part 60, Appendix A.

Compliance with the short term limit demonstrates compliance with the annual limitation.

d. Emission Limitation

NOx emissions shall not exceed 0.43 lb/hr and 1.88 tpy.

Applicable Compliance Method

If required, compliance with the short term limit shall be demonstrated in accordance with Method 7 of 40 CFR Part 60, Appendix A.

Compliance with the short term limit demonstrates compliance with the annual limitation.

g) Miscellaneous Requirements

(1) None.



2. P006, Building 11

Operations, Property and/or Equipment Description:

Liquid organic peroxide process; 2 hold tanks, reactor, 2 wash tanks, filters, and 2 blend tanks controlled by a 2-stage packed bed scrubber

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 3745-15-07	See b)(2)a and c)(1)-(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.

c) Operational Restrictions

(1) The pH of the scrubber liquor shall be maintained at or above 11.

(2) The scrubber liquid flow rate shall not be less than 120gallons/minute.

(3) The acceptable range for the pressure drop across the scrubber shall be between 1 to 6 inches of water.

## d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall record the identification and physical state of all materials used each day this emissions unit is in operation.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (psia), the scrubber water flow rate (gals/min), and the scrubber liquid pH during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquid's pH and flow rate on **daily** 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, flow rate, and pH 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, liquid flow rate, and pH 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 permitted range or limit for the pressure drop, liquid flow rate, or pH based upon information obtained during future performance tests. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Ohio EPA Northeast District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the wet scrubber during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber, the liquid flow rate, or the liquid pH was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
  - b. 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 scrubber;
  - c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the pressure drop, liquid flow rate, and/or scrubber liquid pH into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and

- e. each incident of deviation described in "a" or "b" 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.
- f) Testing Requirements
- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
    - a. The emission testing shall be conducted within 6 months of permit issuance and every 5 years thereafter.
    - b. The emission testing shall be conducted to demonstrate that the control efficiency of the packed bed tower for organic compounds has not degraded.
    - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1-4 and 18 of 40 CFR Part 60, Appendix A.  
  
Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
    - d. 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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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.
    - e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA Northeast District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
    - f. 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 Northeast 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 Northeast District Office's refusal to accept the results of the emission test(s).

- g. Personnel from the Ohio EPA Northeast 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.
  - h. 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 Northeast 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 Northeast District Office.
- g) Miscellaneous Requirements
  - (1) None.



3. P010, Building 14

Operations, Property and/or Equipment Description:

Liquid organic peroxide process unit: 2 reactors(V101 and V102) and stripping column (K101), condenser and baghouse

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	OC emissions shall not exceed 15 lbs/hr, 142.5 lbs/day and 26 tpy.  PE shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf), 0.08 lb/hr, and 0.35 tpy.  Visible emissions shall not exceed 5% opacity, as a 6-minute average.
b	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

- (2) Additional Terms and Conditions
  - a. All of the OC emissions from this emissions unit shall be vented to a condenser that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
  - b. The emissions from this emissions unit shall be vented to a baghouse at all times the emissions unit is in operation.
- c) Operational Restrictions
  - (1) This equipment shall be used for the production of the following liquid organic peroxides: 2,5-Dimethyl, 2,5-Di (tert-butylperoxy) hexyne-3 and 2,5-Dimethyl, 2,5-Di (tert-butylperoxy) hexane. The production of other organic materials may be considered a modification in accordance with OAC rule 3745-31-01(QQQ) and may require a permit to install.
  - (2) The maximum number of batches produced per year shall not exceed 1095.
  - (3) A carbon dioxide gas blanketing system shall be used on the V101 and V102 reactors when those reactors contain liquid organic material. The gas blanketing system shall be in operation at all times, except when it is necessary for the operator to enter the cell in which the reactors are located. The gas flow rate into the reactors shall not be less than 80% of the average gas flow rate during the most recent emission test that demonstrated the emissions unit was in compliance.
  - (4) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average temperature of the exhaust gases from the condenser, for any 3-hour block of time, shall not be more than 11° F above the average temperature measured during the most recent performance test that demonstrated the emissions unit(s), controlled by the condenser, was/were in compliance.
  - (5) The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications, until such time as any required performance testing is conducted and an alternative pressure drop range and/or limit is established.
  - (6) The pressure drop across the stripping column shall be maintained within the range documented during the most recent emission test that demonstrated this emissions unit was in compliance.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information each day for this emissions unit:
    - a. the identification of each chemical compound employed and its physical state;
    - b. the number of hours of operation;

- c. the number of batches produced;
  - d. an estimate of the daily OC emission rate, in pounds; and
  - e. an estimate of the average hourly OC emission rate, in pounds.
- (2) The permittee shall maintain monthly records of the number of batches produced in this emissions unit.
- (3) The permittee shall continuously monitor and record the flow rate of the carbon dioxide gas used to blanket reactors V101 and V102.
- (4) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the K101 stripping column is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1\%$  of the temperature being measured or  $\pm 5^\circ$  F, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the condenser was/were in operation, during which the average temperature of the exhaust gases from the condenser was more than  $11^\circ$  F above the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
  - b. a log of the downtime for the capture (collection) system, condenser, and monitoring equipment when the associated emissions unit(s) was/were in operation.
- (5) Whenever the monitored temperature of the exhaust gases from the condenser deviates from the range/limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
  - a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control

equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was deviation;
- e. the temperature readings of the exhaust gas from condenser 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.

The exhaust gas temperature range/limit 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 permitted exhaust gas temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable OC emission rate for the controlled emissions unit(s). In addition, approved revisions to the exhaust gas temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (6) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse once per shift. 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. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

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

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

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

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

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

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

- (7) The permittee shall properly operate and maintain equipment to monitor the pressure drop across the stripping column while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the stripping column once per shift.
- (8) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack

serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

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

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Ohio EPA Northeast District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the condenser and baghouse during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases from the condenser was outside of the acceptable range;

- b. 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 condenser;
  - c. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
  - d. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
  - e. each incident of deviation described in "a" through "d" (above) where a prompt investigation was not conducted;
  - f. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of the exhaust gases from the condenser into compliance with the acceptable range, was determined to be necessary and was not taken;
  - g. each incident of deviation described in "c" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - h. each incident of deviation described in "a" through "d" 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.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term d)(8):
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- f) Testing Requirements
- (1) Compliance with the Emission Limitations specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation  
Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.
- Applicable Compliance Method  
If required, compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emission Limitation

OC emissions shall not exceed 15 lbs/hr, 142.5 lbs/day and 26 tpy

Applicable Compliance Method

Compliance with the hourly limit shall be established by the testing in f)(2).

Compliance with the daily limit shall be demonstrated by the recordkeeping and reporting in sections d)(1) and e).

Daily emissions shall be calculated by multiplying the results of the latest emission test (in lbs OC/batch) by the number of batches/day.

Compliance with the annual limit shall be determined by multiplying the hourly rate (lbs OC/hr) by annual operating hours (hrs/yr) and dividing by 2,000 lbs/ton.

c. Emission Limitation

PE shall not exceed 0.03 gr/dscf, 0.08 lb/hr and 0.35 tpy

Applicable Compliance Method

If required, compliance with the grain loading and short term limits shall be demonstrated in accordance with Method 5 of 40 CFR Part 60, Appendix A.

Compliance with the annual limit shall be determined by multiplying the hourly rate (lb PE/hr) by annual operating hours (hrs/yr) and dividing by 2,000 lbs/ton.

## (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 5 years of permit issuance.
- b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 25 or 25A of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- c. The permittee shall record the pressure drop across the baghouse and stripping column every 5 minutes during each test run. The permittee shall use this data to define the acceptable operating range for each control device.
- d. 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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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.
- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable

emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA Northeast District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

- f. 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 Northeast 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 Northeast District Office's refusal to accept the results of the emission test(s).
- g. Personnel from the Ohio EPA Northeast 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.
- h. 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 Northeast 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 Northeast District Office.

g) **Miscellaneous Requirements**

- (1) None.

**4. P011, WWTP**

**Operations, Property and/or Equipment Description:**

Wastewater treatment plant

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	OC emissions shall not exceed 1.70 tpy

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for this emissions unit:

- a. the number of gallons recovered; and
- b. calculations of the estimated emissions from the wastewater operations, in lbs.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Ohio EPA Northeast District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

- (1) Compliance with the Emission Limitations specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation  
OC emissions shall not exceed 1.70 tpy

Applicable Compliance Method

Compliance shall be determined by the recordkeeping and reporting in sections d) and e) and by using the Surface Impoundment Modeling System (SIMS), as outlined in AP 42, 5<sup>th</sup> ed., Chapter 4.3, "Waste Water Collection, Treatment and Storage." (02/98).

g) Miscellaneous Requirements

- (1) None.



5. P012, Building 31

Operations, Property and/or Equipment Description:

Continuous organic peroxide manufacturing process controlled by a wet scrubber

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 0.6 lb/hr or 3.1 tpy See b)(2)a.

(2) Additional Terms and Conditions

a. The emission limitations for OC are based on the uncontrolled potential to emit (PTE) for this emissions unit, therefore, no monitoring or record keeping is required to document compliance with the emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Ohio EPA Northeast District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

- (1) Compliance with the Emission Limitations specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

OC emissions shall not exceed 0.6 lb/hr and 3.1 tpy

Applicable Compliance Method

The OC limitations were established/ confirmed during emissions testing conducted on March 18, 2010.

If required, the organic compound emission rate shall be determined in accordance with Methods 25 or 25A of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.