



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL
PICKAWAY COUNTY
Application No: 01-12083
Fac ID: 0165000007**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
FFFF	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 6/26/2007

PPG Industries Inc
Meghan Roe
559 Pittsburgh Road
Circleville, OH 43113

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action of the Director is final 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 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

Sincerely,

Michael W. Ahern

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

CC: USEPA

CDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install
Terms and Conditions

Issue Date: 6/26/2007
Effective Date: 6/26/2007

FINAL PERMIT TO INSTALL 01-12083

Application Number: 01-12083

Facility ID: 0165000007

Permit Fee: **\$900**

Name of Facility: PPG Industries Inc

Person to Contact: Meghan Roe

Address: 559 Pittsburgh Road
Circleville, OH 43113

Location of proposed air contaminant source(s) [emissions unit(s)]:
559 Pittsburgh Rd
Circleville, Ohio

Description of proposed emissions unit(s):
Four storage tanks and reactor system.

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

Chris Korleski

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

12. 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.

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PPG Industries Inc
PTI Application: 01-12083
Issued: 6/26/2007

Facility ID: 016500007

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or 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.

5. Construction of New Sources(s)

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

6. 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.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The

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

C. 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 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>
VOC	7.5
HAP	0.3
HAPs	0.5

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. 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 - (P039) - CR-1 (nine feed tanks, one reactor, seven post-reactor process tanks controlled by a thermal oxidizer)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.I.2.a. below. The requirements of this rule also includes compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-21-07(G)(6), , 40 CFR Part 63 Subpart FFFF and 40 CFR Part 63 Subpart A.
OAC rule 3745-21-13(F)	See A.I.2.b. below.
OAC rule 3745-21-07(G)(2)	The OC emission limitations specified in this rule is less stringent than the OC emission limitations established pursuant to 40 CFR Part 63 Subpart FFFF.
OAC rule 3745-21-07(G)(6)	The OC emission limitations specified in this rule is less stringent than the OC emission limitations established pursuant to 40 CFR Part 63 Subpart FFFF.
40 CFR Part 63 Subpart FFFF	See A.I.2.c - A.I.2.g. below .
40 CFR Part 63 Subpart A	See A.I.2.h. below.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC emissions from this air contaminant source since the calculated annual emission rate for OC is less than ten tons per year taking into account the federally enforceable rule limit of 8 pounds of OC per hour and 40 pounds of OC per day under OAC rule 3745-21-07(G)(2), and 40 Code of Federal Regulations (CFR) Part 63 Subpart FFFF.

- 2.b This emissions unit is exempt from the requirements of OAC rule 3745-21-13 pursuant to OAC rule 3745-21-13(A)(1)(a).
- 2.c The permittee shall reduce emissions of total organic hazardous air pollutant (HAP) by $\geq 98\%$ by weight or to an outlet process concentration ≤ 20 ppmv as organic HAP or total organic compound (TOC) by venting emissions through a closed-vent system to a thermal oxidation unit (TOU).
- 2.d This emission unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (MACT) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63.
- 2.e The application and enforcement of these standards are delegated to Ohio EPA, except as noted in the applicable Subpart. The requirements of 40 CFR Part 63 are also federally enforceable.
- 2.f The permittee shall comply with all applicable requirements of 40 CFR Part 63 Subpart FFFF for Group 1 continuous process vents, including those incorporated by reference, upon startup of the emissions unit.
- 2.g Table 12 to 40 CFR Part 63, Subpart FFFF shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.h The MACT General Provisions (40 CFR Part 63, Subpart A) codify certain procedures and criteria for all 40 CFR Part 63 MACT and apply to the permittee as indicated in the final rule. The General Provisions contain administrative procedures, preconstruction review procedures for new sources, and procedures for conducting compliance-related activities such as notifications, reporting and recordkeeping, performance testing, and monitoring. The final rule refers to individual sections of the General Provisions to emphasize key sections that are relevant. However, unless specifically overridden in the final rule, all of the applicable General Provisions requirements apply to the permittee.

II. Operational Restrictions

- 1. The permittee shall control VOC emissions from this emissions unit through the use of a closed vent system and a thermal oxidizer unit (TOU) at all times the emission unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. For each day this emissions unit operates, the permittee shall collect and record the following information for this emissions unit:
 - a. the hours of operation of this emissions unit; and

- b. the hours of operation of the capture and control equipment for this emissions unit; and
 - c. any three hour block of time the TOU temperature was below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.
2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the TOU temperature during operation of this emissions unit, including periods of startup and shutdown as required by 60 CFR Part 63 Subpart FFFF. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The monitoring equipment shall be installed in the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs in accordance with 40 CFR 63.988(c)(1), calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
3. Whenever the monitored value for the TOU temperature deviates from the range specified below, the permittee shall maintain records of this deviation according to the requirements of 40 CFR 63.2520(e). The maintenance of records required by 40 CFR 63.2520(e) 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 TOU temperature shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.
5. This range is effective until compliance testing has been conducted, as required in this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. Following compliance testing, the acceptable temperature range, for any 3-hour block of time the emissions unit is in operation, shall not be less than the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance. The permittee may revise the range based upon future emission tests that demonstrate compliance with the OC destruction efficiency for this emissions unit.
6. The permittee shall implement inspections of the closed vent system in accordance with the requirements of 40 CFR Part 63.2480. This condition shall become effective upon startup of the emissions unit.
7. The permittee shall maintain all of the records in 40 CFR 63.2520, 40 CFR 63.2525 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply.

IV. 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 TOU was not operating within the acceptable temperature range; and
 - b. any record of downtime for the closed vent system, TOU, and monitoring equipment, when the emissions unit was in operation; and
 - c. the probable cause of the deviation described in (a); and
 - d. any corrective actions or preventive measures taken as a result of the deviation described in (a).

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 all of the notifications in 40 CFR 63.2515 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply and by the dates as specified by rule.
3. The permittee shall submit all of the reports in 40 CFR 63.2520 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply and by the dates as specified by rule. The Compliance report required by 40 CFR 63.2520(e) shall satisfy the semiannual reporting requirements of the General Terms and Conditions (Section I.A.1.c.iii) of this permit.

V. Testing Requirements

1. Compliance with the emission limitation in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation: The permittee shall reduce emissions of total organic hazardous air pollutant (HAP) by $\geq 98\%$ by weight or to an outlet process concentration ≤ 20 ppmv as organic HAP or total organic compound (TOC) by venting emissions through a closed-vent system to a thermal oxidation unit (TOU).

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

- i. The following test method(s) shall be employed to determine the overall OC control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4 and the option of one of the following test methods per 40 CFR 63.2540(g)(4): 18, 25, 25A, or 320.
- ii. The test(s) shall be conducted while P038 is venting emissions to the TOU. This emission unit shall be operated at maximum representative operating conditions, unless otherwise specified or approved by the Ohio EPA, Central District Office.

The OC control efficiency (i.e. the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Section A.V.1.c.i of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. 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 - (P039) - CR-1 (nine feed tanks, one reactor, seven post-reactor process tanks controlled by a thermal oxidizer)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. 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 - (T238) - Storage Tank 145 for CR-1 process, controlled by a thermal oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.I.2.a. below. The requirements of this rule also includes compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-21-07(G)(6), 40 CFR Part 63 Subpart FFFF and 40 CFR Part 63 Subpart A.
OAC rule 3745-21-07(G)(2)	The OC emission limitations specified in this rule is less stringent than the OC emission limitations established pursuant to 40 CFR Part 63 Subpart FFFF.
OAC rule 3745-21-07(G)(6)	The OC emission limitations specified in this rule is less stringent than the OC emission limitations established pursuant to 40 CFR Part 63 Subpart FFFF.
OAC rule 3745-21-09(L)	See A.I.2.b. below.
40 CFR Part 63 Subpart FFFF	See A.I.2.c - A.I.2.f. below
40 CFR Part 63 Subpart A	See A.I.2.g. and A.I.2.h. below.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC emissions from this air contaminant source since the calculated annual emission rate for OC is less than ten tons per year taking into account the federally enforceable rule limit of 8 pounds of OC per hour and 40 pounds of OC per day under OAC rule 3745-21-07(G)(2), and 40 Code of Federal Regulations (CFR) Part 63 Subpart FFFF.

- 2.b This emissions unit is exempt from the requirements of OAC rule 3745-21-09(L) pursuant to OAC rule 3745-21-09(L)(2).
- 2.c The permittee shall reduce emissions of total organic hazardous air pollutant (HAP) by $\geq 95\%$ by weight or to an outlet process concentration ≤ 20 ppmv as organic HAP or total organic compound (TOC) by venting emissions through a closed-vent system to a thermal oxidation unit (TOU).
- 2.d This emission unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (MACT) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63.
- 2.e The application and enforcement of these standards are delegated to Ohio EPA, except as noted in the applicable Subpart. The requirements of 40 CFR Part 63 are also federally enforceable.
- 2.f The permittee shall comply with all applicable requirements of 40 CFR 63 Subpart FFFF for Group 1 storage tanks, including those incorporated by reference, upon startup of the emissions unit.
- 2.g Table 12 to 40 CFR Part 63, Subpart FFFF shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.h The MACT General Provisions (40 CFR Part 63, Subpart A) codify certain procedures and criteria for all 40 CFR Part 63 MACT and apply to the permittee as indicated in the final rule. The General Provisions contain administrative procedures, preconstruction review procedures for new sources, and procedures for conducting compliance-related activities such as notifications, reporting and recordkeeping, performance testing, and monitoring. The final rule refers to individual sections of the General Provisions to emphasize key sections that are relevant. However, unless specifically overridden in the final rule, all of the applicable General Provisions requirements apply to the permittee.

II. Operational Restrictions

- 1. The permittee shall control VOC emissions from this emissions unit through the use of a closed vent system and a thermal oxidizer unit (TOU) at all times the emission unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. For each day this emissions unit operates, the permittee shall collect and record the following information for this emissions unit:
 - a. the hours of operation of this emissions unit; and

- b. the hours of operation of the capture and control equipment for this emissions unit; and
 - c. any three hour block of time the TOU temperature was below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.
2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the TOU temperature during operation of this emissions unit, including periods of startup and shutdown as required by 60 CFR Part 63 Subpart FFFF. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The monitoring equipment shall be installed in the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs in accordance with 40 CFR 63.988(c)(1), calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
3. Whenever the monitored value for the TOU temperature deviates from the range specified below, the permittee shall maintain records of this deviation according to the requirements of 40 CFR 63.2520(e). The maintenance of records required by 40 CFR 63.2520(e) 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 TOU temperature shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.
5. This range is effective until compliance testing has been conducted, as required in this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. Following compliance testing, the acceptable temperature range, for any 3-hour block of time the emissions unit is in operation, shall not be less than the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance. The permittee may **revise** the range based upon future emission tests that demonstrate compliance with the OC destruction efficiency for this emissions unit.
6. The permittee shall implement inspections of the closed vent system in accordance with the requirements of 40 CFR Part 63.2480. This condition shall become effective upon startup of the emissions unit.
7. The permittee shall maintain all of the records in 40 CFR 63.2520, 40 CFR 63.2525 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply.

IV. 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 TOU was not operating within the acceptable temperature range; and
 - b. any record of downtime for the closed vent system, TOU, and monitoring equipment, when the emissions unit was in operation; and
 - c. the probable cause of the deviation described in (a); and
 - d. any corrective actions or preventive measures taken as a result of the deviation described in (a).

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 all of the notifications in 40 CFR 63.2515 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply and by the dates as specified by rule.
3. The permittee shall submit all of the reports in 40 CFR 63.2520 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply and by the dates as specified by rule. The Compliance report required by 40 CFR 63.2520(e) shall satisfy the semiannual reporting requirements of the General Terms and Conditions (Section I.A.1.c.iii) of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation: The permittee shall reduce emissions of total organic hazardous air pollutant (HAP) by $\geq 95\%$ by weight or to an outlet process concentration ≤ 20 ppmv as organic HAP or total organic compound (TOC) by venting emissions through a closed-vent system to a thermal oxidation unit (TOU).

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

- i. The following test method(s) shall be employed to determine the overall OC control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4 and the option of one

of the following test methods per 40 CFR 63.2540(g)(4): 18, 25, 25A, or 320.

- ii. The test(s) shall be conducted while T238 is operated at maximum representative operating conditions, unless otherwise specified or approved by the Ohio EPA, Central District Office.

The OC control efficiency (i.e. the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Section A.V.1.c.i of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. 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 - (T238) - Storage Tank 145 for CR-1 process, controlled by a thermal oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. 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 - (T239) - Storage Tank 146 for CR-1 process, controlled by a thermal oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.I.2.a. below. The requirements of this rule also includes compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-21-07(G)(6), 40 CFR Part 63 Subpart FFFF and 40 CFR Part 63 Subpart A.
OAC rule 3745-21-07(G)(2)	The OC emission limitations specified in this rule is less stringent than the OC emission limitations established pursuant to 40 CFR Part 63 Subpart FFFF.
OAC rule 3745-21-07(G)(6)	The OC emission limitations specified in this rule is less stringent than the OC emission limitations established pursuant to 40 CFR Part 63 Subpart FFFF.
OAC rule 3745-21-09(L)	See A.I.2.b. below.
40 CFR Part 63 Subpart FFFF	See A.I.2.c - A.I.2.f. below
40 CFR Part 63 Subpart A	See A.I.2.g. and A.I.2.h. below.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC emissions from this air contaminant source since the calculated annual emission rate for OC is less than ten tons per year taking into account the federally enforceable rule limit of 8 pounds of OC per hour and 40 pounds of OC per day under OAC rule 3745-21-07(G)(2), and 40 Code of Federal Regulations (CFR) Part 63 Subpart FFFF.

- 2.b This emissions unit is exempt from the requirements of OAC rule 3745-21-09(L) pursuant to OAC rule 3745-21-09(L)(2).
- 2.c The permittee shall reduce emissions of total organic hazardous air pollutant (HAP) by $\geq 95\%$ by weight or to an outlet process concentration ≤ 20 ppmv as organic HAP or total organic compound (TOC) by venting emissions through a closed-vent system to a thermal oxidation unit (TOU).
- 2.d This emission unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (MACT) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63.
- 2.e The application and enforcement of these standards are delegated to Ohio EPA, except as noted in the applicable Subpart. The requirements of 40 CFR Part 63 are also federally enforceable.
- 2.f The permittee shall comply with all applicable requirements of 40 CFR 63 Subpart FFFF for Group 1 storage tanks, including those incorporated by reference, upon startup of the emissions unit.
- 2.g Table 12 to 40 CFR Part 63, Subpart FFFF shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.h The MACT General Provisions (40 CFR Part 63, Subpart A) codify certain procedures and criteria for all 40 CFR Part 63 MACT and apply to the permittee as indicated in the final rule. The General Provisions contain administrative procedures, preconstruction review procedures for new sources, and procedures for conducting compliance-related activities such as notifications, reporting and recordkeeping, performance testing, and monitoring. The final rule refers to individual sections of the General Provisions to emphasize key sections that are relevant. However, unless specifically overridden in the final rule, all of the applicable General Provisions requirements apply to the permittee.

II. Operational Restrictions

- 1. The permittee shall control VOC emissions from this emissions unit through the use of a closed vent system and a thermal oxidizer unit (TOU) at all times the emission unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. For each day this emissions unit operates, the permittee shall collect and record the following information for this emissions unit:
 - a. the hours of operation of this emissions unit; and

- b. the hours of operation of the capture and control equipment for this emissions unit; and
 - c. any three hour block of time the TOU temperature was below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.
2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the TOU temperature during operation of this emissions unit, including periods of startup and shutdown as required by 60 CFR Part 63 Subpart FFFF. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The monitoring equipment shall be installed in the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs in accordance with 40 CFR 63.988(c)(1), calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
3. Whenever the monitored value for the TOU temperature deviates from the range specified below, the permittee shall maintain records of this deviation according to the requirements of 40 CFR 63.2520(e). The maintenance of records required by 40 CFR 63.2520(e) 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 TOU temperature shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.
5. This range is effective until compliance testing has been conducted, as required in this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. Following compliance testing, the acceptable temperature range, for any 3-hour block of time the emissions unit is in operation, shall not be less than the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance. The permittee may revise the range based upon future emission tests that demonstrate compliance with the OC destruction efficiency for this emissions unit.
6. The permittee shall implement inspections of the closed vent system in accordance with the requirements of 40 CFR Part 63.2480. This condition shall become effective upon startup of the emissions unit.
7. The permittee shall maintain all of the records in 40 CFR 63.2520, 40 CFR 63.2525 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply.

IV. 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 TOU was not operating within the acceptable temperature range; and
 - b. any record of downtime for the closed vent system, TOU, and monitoring equipment, when the emissions unit was in operation; and
 - c. the probable cause of the deviation described in (a); and
 - d. any corrective actions or preventive measures taken as a result of the deviation described in (a).

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 all of the notifications in 40 CFR 63.2515 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply and by the dates as specified by rule.
3. The permittee shall submit all of the reports in 40 CFR 63.2520 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply and by the dates as specified by rule. The Compliance report required by 40 CFR 63.2520(e) shall satisfy the semiannual reporting requirements of the General Terms and Conditions (Section I.A.1.c.iii) of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation: The permittee shall reduce emissions of total organic hazardous air pollutant (HAP) by $\geq 95\%$ by weight or to an outlet process concentration ≤ 20 ppmv as organic HAP or total organic compound (TOC) by venting emissions through a closed-vent system to a thermal oxidation unit (TOU).

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

- i. The following test method(s) shall be employed to determine the overall OC control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4 and the option of one

of the following test methods per 40 CFR 63.2540(g)(4): 18, 25, 25A, or 320.

- ii. The test(s) shall be conducted while T239 is operated at maximum representative operating conditions, unless otherwise specified or approved by the Ohio EPA, Central District Office.

The OC control efficiency (i.e. the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Section A.V.1.c.i of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. 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 - (T239) - Storage Tank 146 for CR-1 process, controlled by a thermal oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. 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 -(T240) - Storage Tank 185 for CR-1 process, controlled by a thermal oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.I.2.a. below. The requirements of this rule also includes compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-21-07(G)(6), 40 CFR Part 63 Subpart FFFF and 40 CFR Part 63 Subpart A.
OAC rule 3745-21-07(G)(2)	The OC emission limitations specified in this rule is less stringent than the OC emission limitations established pursuant to 40 CFR Part 63 Subpart FFFF.
OAC rule 3745-21-07(G)(6)	The OC emission limitations specified in this rule is less stringent than the OC emission limitations established pursuant to 40 CFR Part 63 Subpart FFFF.
OAC rule 3745-21-09(L)	See A.I.2.b. below.
40 CFR Part 60 Subpart Kb	See A.I.2.c. below.
40 CFR Part 63 Subpart FFFF	See A.I.2.d - A.I.2.g. below
40 CFR Part 63 Subpart A	See A.I.2.h. and A.I.2.i. below.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC emissions from this air contaminant source since the calculated annual emission rate for OC is less than ten tons per year taking into account the federally enforceable rule limit of 8 pounds of OC per

hour and 40 pounds of OC per day under OAC rule 3745-21-07(G)(2), and 40 Code of Federal Regulations (CFR) Part 63 Subpart FFFF.

- 2.b** This emissions unit is exempt from the requirements of OAC rule 3745-21-09(L) pursuant to OAC rule 3745-21-09(L)(2).
- 2.c** According to the information submitted by the applicant, this Group 1 storage tank is exempt from the control requirements of 40 CFR 60.112b(b). The record keeping requirements referenced in A.I.2.b still applies.
- 2.d** The permittee shall reduce emissions of total organic hazardous air pollutant (HAP) by $\geq 95\%$ by weight or to an outlet process concentration ≤ 20 ppmv as organic HAP or total organic compound (TOC) by venting emissions through a closed-vent system to a thermal oxidation unit (TOU).
- 2.e** This emission unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (MACT) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63.
- 2.f** The application and enforcement of these standards are delegated to Ohio EPA, except as noted in the applicable Subpart. The requirements of 40 CFR Part 63 are also federally enforceable.
- 2.g** The permittee shall comply with all applicable requirements of 40 CFR 63 Subpart FFFF for Group 1 storage tanks, including those incorporated by reference, upon startup of the emissions unit.
- 2.h** Table 12 to 40 CFR Part 63, Subpart FFFF shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.i** The MACT General Provisions (40 CFR Part 63, Subpart A) codify certain procedures and criteria for all 40 CFR Part 63 MACT and apply to the permittee as indicated in the final rule. The General Provisions contain administrative procedures, preconstruction review procedures for new sources, and procedures for conducting compliance-related activities such as notifications, reporting and recordkeeping, performance testing, and monitoring. The final rule refers to individual sections of the General Provisions to emphasize key sections that are relevant. However, unless specifically overridden in the final rule, all of the applicable General Provisions requirements apply to the permittee.

II. Operational Restrictions

1. The permittee shall control VOC emissions from this emissions unit through the use of a closed vent system and a thermal oxidizer unit (TOU) at all times the emission unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. For each day this emissions unit operates, the permittee shall collect and record the following information for this emissions unit:
 - a. the hours of operation of this emissions unit; and
 - b. the hours of operation of the capture and control equipment for this emissions unit; and
 - c. any three hour block of time the TOU temperature was below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.
2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the TOU temperature during operation of this emissions unit, including periods of startup and shutdown as required by 60 CFR Part 63 Subpart FFFF. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The monitoring equipment shall be installed in the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs in accordance with 40 CFR 63.988(c)(1), calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
3. Whenever the monitored value for the TOU temperature deviates from the range specified below, the permittee shall maintain records of this deviation according to the requirements of 40 CFR 63.2520(e). The maintenance of records required by 40 CFR 63.2520(e) 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 TOU temperature shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.

5. This range is effective until compliance testing has been conducted, as required in this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. Following compliance testing, the acceptable temperature range, for any 3-hour block of time the emissions unit is in operation, shall not be less than the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance. The permittee may revise the range based upon future emission tests that demonstrate compliance with the OC destruction efficiency for this emissions unit.

6. The permittee shall implement inspections of the closed vent system in accordance with the requirements of 40 CFR Part 63.2480. This condition shall become effective upon startup of the emissions unit.
7. The permittee shall maintain all of the records in 40 CFR 63.2520, 40 CFR 63.2525 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply.
8. The permittee shall maintain all of the records required by 40 CFR Part 60.116 that apply.

IV. 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 TOU was not operating within the acceptable temperature range; and
 - b. any record of downtime for the closed vent system, TOU, and monitoring equipment, when the emissions unit was in operation; and
 - c. the probable cause of the deviation described in (a); and
 - d. any corrective actions or preventive measures taken as a result of the deviation described in (a).

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 all of the notifications in 40 CFR 63.2515 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply and by the dates as specified by rule.
3. The permittee shall submit all of the reports in 40 CFR 63.2520 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply and by the dates as specified by rule. The Compliance report required by 40 CFR 63.2520(e) shall satisfy the semiannual reporting requirements of the General Terms and Conditions (Section I.A.1.c.iii) of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation: The permittee shall reduce emissions of total organic hazardous air pollutant (HAP) by $\geq 95\%$ by weight or to an outlet process concentration ≤ 20 ppmv as organic HAP or total organic compound (TOC) by venting emissions through a closed-vent system to a thermal oxidation unit (TOU).

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

- i. The following test method(s) shall be employed to determine the overall OC control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4 and the option of one of the following test methods per 40 CFR 63.2540(g)(4): 18, 25, 25A, or 320.
- ii. The test(s) shall be conducted while T240 is venting emissions to the TOU. This emission unit shall be operated at maximum representative operating conditions, unless otherwise specified or approved by the Ohio EPA, Central District Office.

The OC control efficiency (i.e. the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Section A.V.1.c.i of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the

Ohio EPA, Central District Office within 30 days following completion of the test(s).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. 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 - (T240) - Storage Tank 185 for CR-1 process, controlled by a thermal oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. 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 - (T241) - Storage Tank 186 for CR-1 process, controlled by a thermal oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.I.2.a. below. The requirements of this rule also includes compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-21-07(G)(6), 40 CFR Part 63 Subpart FFFF and 40 CFR Part 63 Subpart A.
OAC rule 3745-21-07(G)(2)	The OC emission limitations specified in this rule is less stringent than the OC emission limitations established pursuant to 40 CFR Part 63 Subpart FFFF.
OAC rule 3745-21-07(G)(6)	The OC emission limitations specified in this rule is less stringent than the OC emission limitations established pursuant to 40 CFR Part 63 Subpart FFFF.
OAC rule 3745-21-09(L)	See A.I.2.b. below.
40 CFR Part 60 Subpart Kb	See A.I.2.c. below.
40 CFR Part 63 Subpart FFFF	See A.I.2.d - A.I.2.g. below
40 CFR Part 63 Subpart A	See A.I.2.h. and A.I.2.i. below.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC emissions from this air contaminant source since the calculated annual emission rate for OC is less than ten tons per year taking into account the federally enforceable rule limit of 8 pounds of OC per hour and 40 pounds of OC per day under OAC rule 3745-21-07(G)(2), and 40 Code of Federal Regulations (CFR) Part 63 Subpart FFFF.

- 2.b This emissions unit is exempt from the requirements of OAC rule 3745-21-09(L) pursuant to OAC rule 3745-21-09(L)(2).
- 2.c According to the information submitted by the applicant, this Group 1 storage tank is exempt from the control requirements of 40 CFR 60.112b(b). The record keeping requirements referenced in A.I.2.b still applies.
- 2.d The permittee shall reduce emissions of total organic hazardous air pollutant (HAP) by $\geq 95\%$ by weight or to an outlet process concentration ≤ 20 ppmv as organic HAP or total organic compound (TOC) by venting emissions through a closed-vent system to a thermal oxidation unit (TOU).
- 2.e This emission unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (MACT) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63.
- 2.f The application and enforcement of these standards are delegated to Ohio EPA, except as noted in the applicable Subpart. The requirements of 40 CFR Part 63 are also federally enforceable.
- 2.g The permittee shall comply with all applicable requirements of 40 CFR 63 Subpart FFFF for Group 1 storage tanks, including those incorporated by reference, upon startup of the emissions unit.
- 2.h Table 12 to 40 CFR Part 63, Subpart FFFF shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- 2.i The MACT General Provisions (40 CFR Part 63, Subpart A) codify certain procedures and criteria for all 40 CFR Part 63 MACT and apply to the permittee as indicated in the final rule. The General Provisions contain administrative procedures, preconstruction review procedures for new sources, and procedures for conducting compliance-related activities such as notifications, reporting and recordkeeping, performance testing, and monitoring. The final rule refers to individual sections of the General Provisions to emphasize key sections that are relevant. However, unless specifically overridden in the final rule, all of the applicable General Provisions requirements apply to the permittee.

II. Operational Restrictions

- 1. The permittee shall control VOC emissions from this emissions unit through the use of a closed vent system and a thermal oxidizer unit (TOU) at all times the emission unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. For each day this emissions unit operates, the permittee shall collect and record the following information for this emissions unit:
 - a. the hours of operation of this emissions unit; and
 - b. the hours of operation of the capture and control equipment for this emissions unit; and
 - c. any three hour block of time the TOU temperature was below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.
2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the TOU temperature during operation of this emissions unit, including periods of startup and shutdown as required by 60 CFR Part 63 Subpart FFFF. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The monitoring equipment shall be installed in the fire box or in the ductwork immediately downstream of the fire box in a position before any substantial heat exchange occurs in accordance with 40 CFR 63.988(c)(1), calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
3. Whenever the monitored value for the TOU temperature deviates from the range specified below, the permittee shall maintain records of this deviation according to the requirements of 40 CFR 63.2520(e). The maintenance of records required by 40 CFR 63.2520(e) 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 TOU temperature shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.

5. This range is effective until compliance testing has been conducted, as required in this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. Following compliance testing, the acceptable temperature range, for any 3-hour block of time the emissions unit is in operation, shall not be less than the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance. The permittee may revise the range based upon future emission tests that demonstrate compliance with the OC destruction efficiency for this emissions unit.
6. The permittee shall implement inspections of the closed vent system in accordance with the requirements of 40 CFR Part 63.2480. This condition shall become effective upon startup of the emissions unit.

7. The permittee shall maintain all of the records in 40 CFR 63.2520, 40 CFR 63.2525 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply.
8. The permittee shall maintain all of the records required by 40 CFR Part 60.116 that apply.

IV. 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 TOU was not operating within the acceptable temperature range; and
 - b. any record of downtime for the closed vent system, TOU, and monitoring equipment, when the emissions unit was in operation; and
 - c. the probable cause of the deviation described in (a); and
 - d. any corrective actions or preventive measures taken as a result of the deviation described in (a).

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 all of the notifications in 40 CFR 63.2515 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply and by the dates as specified by rule.
3. The permittee shall submit all of the reports in 40 CFR 63.2520 and the MACT General Provisions (40 CFR Part 63, Subpart A) that apply and by the dates as specified by rule. The Compliance report required by 40 CFR 63.2520(e) shall satisfy the semiannual reporting requirements of the General Terms and Conditions (Section I.A.1.c.iii) of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation: The permittee shall reduce emissions of total organic hazardous air pollutant (HAP) by $\geq 95\%$ by weight or to an outlet process concentration ≤ 20 ppmv as organic HAP or total organic compound (TOC) by venting emissions through a closed-vent system to a thermal oxidation unit (TOU).

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

- i. The following test method(s) shall be employed to determine the overall OC control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4 and the option of one of the following test methods per 40 CFR 63.2540(g)(4): 18, 25, 25A, or 320.
- ii. The test(s) shall be conducted while T241 is venting emissions to the TOU. This emission unit shall be operated at maximum representative operating conditions, unless otherwise specified or approved by the Ohio EPA, Central District Office.

The OC control efficiency (i.e. the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Section A.V.1.c.i of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. 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 - (T241) - Storage Tank 186 for CR-1 process, controlled by a thermal oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None