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

12/19/2011

Certified Mail

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

James Riley
DuPont-Circleville
800 DuPont Road
P.O. Box 89, Route 23 South
Circleville, OH 43113-9107

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0165010004
Permit Number: P0109138
Permit Type: Administrative Modification
County: Pickaway

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-CDO; Kentucky

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
DuPont-Circleville

Facility ID:	0165010004
Permit Number:	P0109138
Permit Type:	Administrative Modification
Issued:	12/19/2011
Effective:	12/19/2011

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
DuPont-Circleville

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Authorization

Facility ID:	0165010004
Facility Description:	Plastics Products, N.E.C.
Application Number(s):	M0001478
Permit Number:	P0109138
Permit Description:	Administrative Modification of Permit P0107387: removed OAC 3745-21-07 requirements, and corrected emission limits, monitoring and reporting requirements.
Permit Type:	Administrative Modification
Permit Fee:	$400.00
Issue Date:	12/19/2011
Effective Date:	12/19/2011

This document constitutes issuance to:

DuPont-Circleville
800 DuPont Road
P.O. Box 89, Route 23 South
Circleville, OH 43113-9107

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

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

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

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0109138
Permit Description: Administrative Modification of Permit P0107387: removed OAC 3745-21-07 requirements, and corrected emission limits, monitoring and reporting requirements.

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

Emissions Unit ID:	**P100**
Company Equipment ID:	Film Production Line
Superseded Permit Number:	P0107387
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P101**
Company Equipment ID:	Surface Treater
Superseded Permit Number:	P0107387
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P102**
Company Equipment ID:	Solvent Recovery Area
Superseded Permit Number:	P0107387
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P104**
Company Equipment ID:	Flake Conveying System
Superseded Permit Number:	P0107387
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions,

andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

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

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a

quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

11. Construction of New Sources(s) and Authorization to Install

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

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All

records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

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

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

C. Emissions Unit Terms and Conditions

1. P100, Film Production Line

Operations, Property and/or Equipment Description:

Polyvinyl fluoride film extrusion and forming line comprised of a mix area, extruder with filter, and a casting machine and oven, all controlled by a wet scrubber.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)a.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions from the wet scrubber stack shall not exceed 5.83 tons per year as a rolling, 12-month summation. VOC emissions from the emissions unit stack shall be controlled by a wet scrubber with a minimum control efficiency of 98.98% at all times that the extruder with filter and casting machine and oven are in operation. See b)(2)a. and b.

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a wet scrubber at all times that the extruder with filter and casting machine and oven are in operation. The rolling, 12-month emission limitation is based on the use of the scrubber and the maximum potential cast production rate and maximum solvent usage rate as stated in the PTI application.

b. Fugitive VOC emissions from this emissions unit constitute a summation of VOC emissions from pump seals, valves, and flanges, as well as oven doors and seals. Fugitive VOC emissions from this emissions unit shall not exceed 3.22 tons per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable stack emission limitation(s) contained in this permit, the acceptable range or limit for the pressure drop across the scrubber and the liquid flow rate shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in pounds per square inch, gauge) and the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubberand flow rate on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable range or limit for pressure drop across the scrubber and the liquid flow rate shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date the corrective action was completed;

c. the date and time the deviation ended;

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

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

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

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

These range(s) and/or limit(s) for the pressure drop and liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA Central District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop or liquid flow ratebased upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative permit modification.

(3) The permittee shall maintain monthly records of the following for emissions unit P100:

a. the company identification of each solvent used;

b. the solvent usage rate, in pounds per month;

c. the cast production rate, in pounds per month;

d. the VOC stack emissions from the emission unit, in pounds and tons per month, calculated using the engineering calculations contained in the PTI application(s) associated with this permit, and

e. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions, in tons.

e) Reporting Requirements

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

a. all exceedances of the rolling, 12-month emission limitation for VOC;

b. each period of time (start time and date, and end time and date)when the pressure drop across the scrubber or the liquid flow ratewas outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

c. 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;

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

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

f. each incident of deviation described in “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.

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

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

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 after start-up.

b. The emission testing shall be conducted to demonstrate compliance with the VOC control efficiency.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

VOC: Methods 1-4 and 25 or 25a, as appropriate, 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 test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

f. Personnel from the appropriate Ohio EPA District Office or local air agency 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.

g. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

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

a. Emission Limitation:

VOC emissions from the emissions unit stack shall be controlled by a wet scrubber with a minimum control efficiency of 98.98% at all times that the extruder with filter and casting machine and oven are in operation.

Applicable Compliance Method:

Compliance shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 25 or 25Aand as specified in term f)(1) above. The results of the emissions test shall be reported in terms of percentage of destruction efficiency.

b. Emissions Limitation:

VOC emissions from the wet scrubber stack shall not exceed 5.83 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in Section d)(3).

c. Emissions Limitation:

Fugitive VOC emissions from the emissions unit shall not exceed 3.22 tons per year.

Applicable Compliance Method:

The annual emission limitation is comprised of fugitive emissions from pump seals, valves, and flanges, and is calculated at potential according to engineering calculations included in the PTI application.

g) Miscellaneous Requirements

(1) None.

2. P101, Surface Treater

Operations, Property and/or Equipment Description:

Film Surface Treater (0.92 million Btu per hour, fuel confidential)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

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 3745-17-07(A)(1)	Visible particulate emissions (PE) from the stack shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.
b.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 pound per million Btu of actual heat input.
c.	OAC rule 3745-31-05(A), as effective 11/30/01.	PE emissions shall not exceed 0.01 pounds per hour and 0.03 ton per year. Sulfur dioxide (SO_2)emissions shall not exceed 0.001 pound per hour and 0.002 ton per year. Nitrogen oxides (NO_x) emissions shall not exceed 0.13 pound per hour and 0.57 ton per year. Volatile organic compound (VOC) emissions, including fugitives, shall not exceed 0.55 pound per hour and 1.95 tons per year. Carbon monoxide (CO) emissions shall not exceed 0.08 pound per hour and 0.33 ton per year. The requirements of this rule also include compliance with 3745-17-07 and 3475-17-10.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a., b., and c. below.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06.	See b)(2)d.

(2) Additional Terms and Conditions

a. The permitee shall burn only the fuel applied for in the application for this emissions unit.

b. This emissions unit is permitted at its potential to emit, as defined in OAC rule 3745-31-01, for all pollutants;therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with thehourly emission limitations.

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

d. The following rule paragraph will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, SO_2, NO_x, and VOC emissions from this air contaminant source since the uncontrolled potential to emit for each of these pollutants is less than 10 tons per year.

e. For the purposes of this Permit-to-Install, all PE are considered PM_{10}.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than the confidential fuel for which the permittee has applied, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel, other than the stated fuel for which the permittee has applied, was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

PE shall not exceed 0.020 pound per mmBtu of actual heat input.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum hourly fuel burning capacity of the emissions unit (million standard cubic feet/hr) by the appropriate AP-42, "Compilation of Air Pollutant Emission Factors," 5th Edition, emission factor for the confidential fuel type (lbs PE/million standard cubic feet), and then dividing by the maximum hourly heat input capacity of the emissions unit (0.92 mmBtu per hr).

c. Emission Limitations:

PE emissions shall not exceed 0.01 pound per hour and 0.03 ton per year.

Applicable Compliance Method:

The hourly emission limitation is calculated by multiplying the maximum hourly fuel burning capacity of the emissions unit (million standard cubic feet/hr) by the appropriate AP-42, "Compilation of Air Pollutant Emission Factors," 5th Edition, emission factor for the confidential fuel type (lbs PE/million standard cubic feet).

The annual limitation was established by multiplying the hourly emission limitation by 8760 hours of operation per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly emission limitation is maintained, compliance with the annual emission limitation shall be assumed.

d. Emission Limitations:

SO_2 emissions shall not exceed 0.001 pound per hour and 0.002 ton per year.

Applicable Compliance Method:

The hourly emission limitation is calculated by multiplying the maximum hourly fuel burning capacity of the emissions unit (million standard cubic feet/hr) by the appropriate AP-42, "Compilation of Air Pollutant Emission Factors," 5th Edition, emission factor for the confidential fuel type (lbs SO2/million standard cubic feet).

The annual limitation was established by multiplying the hourly emission limitation by 8760 hours of operation per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly emission limitation is maintained, compliance with the annual emission limitation shall be assumed.

e. Emission Limitations:

NO_x emissions shall not exceed 0.13 pound per hour and 0.57 ton per year.

Applicable Compliance Method:

The hourly emission limitation is calculated by multiplying the hourly fuel burning capacity of the emissions unit (million standard cubic feet/hr) by the appropriate AP-42, "Compilation of Air Pollutant Emission Factors," 5th Edition, emission factor for the confidential fuel type (lbsNOx/million standard cubic feet).

The annual limitation was established by multiplying the hourly emission limitation by 8760 hours of operation per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly emission limitation is maintained, compliance with the annual emission limitation shall be assumed.

f. Emission Limitations:

VOC emissions shall not exceed 0.55 pound per hour and 1.95 tons per year.

Applicable Compliance Method:

The hourly emission limitation is comprised of fugitive emissions from pumps, valves, and flanges as calculated at potential according to engineering calculations included in the PTI application as well as emissions from fuel burning.

The component of the hourly emission limitation from fuel burning is calculated by multiplying the maximum hourly fuel burning capacity of the emissions unit (million standard cubic feet/hr) by the appropriate AP-42, "Compilation of Air

Pollutant Emission Factors," 5th Edition, emission factor for the confidential fuel type (lbs VOC/million standard cubic feet) .

The annual limitation was then calculated by multiplying the component of the hourly emission limitation from fuel burning by 8760 hours of operation per year, and then dividing by 2000 pounds per ton. The fuel burning emissions are then added to the potential fugitive emissions from the application to demonstrate compliance with the emissions limitation.

g. Emission Limitations:

CO emissions shall not exceed 0.08 pound per hour and 0.33 ton per year.

Applicable Compliance Method:

The hourly emission limitation was calculated by multiplying the maximum hourly fuel burning capacity of the emissions unit (million standard cubic feet/hr) by the appropriate AP-42, "Compilation of Air Pollutant Emission Factors," 5th Edition, emission factor for the confidential fuel type (lbs CO/million standard cubic feet).

The annual limitation was established by multiplying the hourly emission limitation by 8760 hours of operation per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly emission limitation is maintained, compliance with the annual emission limitation shall be assumed.

g) Miscellaneous Requirements

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

3. P102, Solvent Recovery Area

Operations, Property and/or Equipment Description:

Solvent Recovery Area consisting of a precolumn vaporizer, a recovery column, and a condenser

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

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), as effective 11/30/01.	Volatile organic compound (VOC) emissions, including fugitive emissions, from the emissions source shall not exceed 0.59pound per hour and 2.59 tons per year. See b)(2)a. and b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06.	See b)(2)c.

(2) Additional Terms and Conditions

a. The hourly VOC emissions limitationwas established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation. Based on this hourly potential emission rate, the unrestricted potential to emit VOCemissions from this emissions unit, based on 8,760 hours per 365 days of operation per year, is 2.59tons per year.

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

EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

c. The following rule paragraph will apply once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan:

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

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

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

<u>Emissions Limitation:</u>

VOC emissions from the emissions unit shall not exceed 0.59 pound per hour and 2.59 tons per year.

<u>Applicable Compliance Method:</u>

The hourly and annual emission limits were established to reflect the potential to emit for the emissions unit and are based on the engineering calculations provided by the permittee in the PTI application.

If required, compliance with the hourly VOC emission limitation above shall be determined by emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 25 or 25a, as appropriate

The annual limitation was established by multiplying the hourly emission limitation by 8760 hours of operation per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly emission limitation is maintained, compliance with the annual emission limitation shall be assumed.

g) Miscellaneous Requirements

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

4. P104, Flake Conveying System

Operations, Property and/or Equipment Description:

Dry Flake Handling and Conveying System

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack or vent shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01.	PE from this emission unit shall not exceed 0.87 pound per hour and 3.81 tons per year. See b)(2)a., b., c. and d.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06.	See b)(2)e.
e.	OAC rule 3745-31-05(F) (Voluntary Limitation)	PE from the emissions unit stacks shall not exceed 2.82 tons per year, as a rolling, 12-month summation. The PE from this emissions unit shall be controlled by process baghouses (Nos. 1 through 5), each with a maximum outlet concentration of 0.005 grain per dry standard cubic foot (gr/dscf). See b)(2)a. and b.

(2) Additional Terms and Conditions

a. This emissions unit is a dry flake handling and conveying system used to convey recycled polymer flakes to two bunkers for storage and to the mix area. The conveying system includes two flake storage bunkers fed by nine handling cyclones controlled by four baghouses (Nos. 2, 3, 4 and 5), and one baghouse (Nos. 1) controlling the delivery of the dry flake to the mix area.

b. The emissions from this emissions unit shall be vented to the baghouses at all times the emissions unit is in operation. The rolling, 12-month emission limitation is based on the use of the baghouses and the maximum potential flake handling rate as stated in the PTI application.

c. The hourly PE emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

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

e. The following rule paragraph will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source since the potential to emit for PE, taking into account air pollution controls installed on the source, is less than 10 tons per year.

f. For the purposes of this Permit-to-Install, all PE are considered PM_{10}.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The acceptable range for the pressure drop across the baghouses shall be based upon the manufacturer's specifications, until such time as any performance testing is conducted and an alternative pressure drop range and/or limit is established.

The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouses 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 baghouses on a 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. 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.

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

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouses was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

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 baghouses;

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

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

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

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

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

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
Visible PE shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

PE emissions from each of the emissions unit stacks shall be controlled by a baghouse with a minimum outlet concentration as described in b)(1)e. at all times that the emissions unit is in operation.

Applicable Compliance Method:

Hourly emissions are based on a calculation using the vendor-provided grain loading factors, 0.005 gr/dscf (for baghouses 1 through 5, as shown below:

$E_{(PE)}$ = 0.005 gr/scf x A x 60 min/hr x 1 lb/7000 gr ; where

A = maximum baghouse air flow rate for each baghouse, as included in the PTI application; and

E = PE rate, in lbs/hr

The annual limitation was established by multiplying the summation of the individual hourly emission rates (E) by 8760 hours of operation per year, and then dividing by 2000 pounds per ton.

c. Emissions Limitation:

Total PE from the emissions unit stacks shall not exceed 2.82 tons, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual PE limitation above shall be determined by multiplying the hourly emission rate [see f)(1)b above] by 8760 hours/year, and then dividing by 2000 pounds per ton.

g) Miscellaneous Requirements

(1) None.