



Environmental Protection Agency

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

4/11/2012

KAREN CANTERBURY
DUPONT POWDER COATINGS USA
4130 LYMAN CT
HILLIARD, OH 43026

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125122188
Permit Number: P0083467
Permit Type: Renewal
County: Franklin

Certified Mail

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

Dear Permit Holder:

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

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

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

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
DUPONT POWDER COATINGS USA**

Facility ID:	0125122188
Permit Number:	P0083467
Permit Type:	Renewal
Issued:	4/11/2012
Effective:	4/11/2012
Expiration:	4/11/2022



Division of Air Pollution Control
Permit-to-Install and Operate
for
DUPONT POWDER COATINGS USA

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Authorization

Facility ID: 0125122188
Application Number(s): A0013841, A0013842
Permit Number: P0083467
Permit Description: Permit to operate emissions units included in previously issued PTI
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 4/11/2012
Effective Date: 4/11/2012
Expiration Date: 4/11/2022
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

DUPONT POWDER COATINGS USA
4130 LYMAN CT
HILLIARD, OH 43026

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

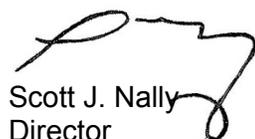
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, 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 this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0083467

Permit Description: Permit to operate emissions units included in previously issued PTI

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

Group Name: Powder coat manufacturing

Emissions Unit ID:	P001
Company Equipment ID:	batch scales and quality control laboratory
Superseded Permit Number:	01-12143
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	bowl mixers and chutes
Superseded Permit Number:	01-12065
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	grinder, cyclone, screen pneumatic transport (ACM401)
Superseded Permit Number:	01-12065
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	grinder, cyclone, screen pneumatic transport (ACM402)
Superseded Permit Number:	01-12065
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	grinder, cyclone, screen pneumatic transport (ACM403)
Superseded Permit Number:	01-12065
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	grinder, cyclone, screen pneumatic transport (ACM5)
Superseded Permit Number:	01-12065
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	grinder, cyclone, screen pneumatic transport (ACM101/2)
Superseded Permit Number:	01-12065
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	proprietary design ribbon blenders
Superseded Permit Number:	01-12065
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	melting/mix operation
Superseded Permit Number:	01-12065
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P010
Company Equipment ID:	Mill #1 (ACM30-1)
Superseded Permit Number:	01-12065
General Permit Category andType:	Not Applicable

Final Permit-to-Install and Operate
DUPONT POWDER COATINGS USA
Permit Number: P0083467
Facility ID: 0125122188
Effective Date: 4/11/2012

Emissions Unit ID:	P011
Company Equipment ID:	Mini Mix Process
Superseded Permit Number:	01-12065
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P013
Company Equipment ID:	ACM 30-2
Superseded Permit Number:	01-12143
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

C. Emissions Unit Terms and Conditions

**1. Emissions Unit Group -Powder coat manufacturing:
P001,P002,P003,P004,P005,P006,P007,P008,P009,P010,P011,P013,**

EU ID	Operations, Property and/or Equipment Description
P001	Batch Scales and Quality Control Laboratory
P002	Bowl Mixers and Chutes
P003	Grinder, Cyclone, Screen, Pneumatic Transport (ACM401)
P004	Grinder, Cyclone, Screen, Pneumatic Transport (ACM402)
P005	Grinder, Cyclone, Screen, Pneumatic Transport (ACM403)
P006	Grinder, cyclone, Screen, Pneumatic Transport (ACM5)
P007	Grinder, Cyclone, Screen, Pneumatic Transport (ACM101-ACM102)
P008	Proprietary Design Ribbon Blenders
P009	Melting / Mixing Operation
P010	30-HP Mill #1 (70-3 ACM 30) (Grinder), Cyclone, Screen Pneumatic Transport, Dust Collector Hood/Hose Connectors for milling/processing of powder coatings
P011	Mini-Mix Process and Mini-Mix Vacuum System
P013	30 HP Mill #2 -(ACM302) (Grinder), Cyclone, Screen Pneumatic Transport, Dust Collector Hood/Hose Connectors for milling/processing of powder coatings

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

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

a. None.

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

a. None

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI No. 01-12065, issued 9/12/2006 and PTI No. 01-12143, issued 8/7/2007.)	PE from the stacks serving these emissions units shall not exceed:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p><u>Emissions Unit P001</u> 1.27 lbs/hr and 5.56 TPY from baghouses NDC-4 and NDC-8, combined.</p> <p><u>Emissions Unit P002</u> 1.97 lbs/hr and 8.63 TPY from baghouse NDC-1.</p> <p><u>Emissions Unit P003</u> 0.51 lb/hr and 2.25 TPY from baghouse PDC-1.</p> <p><u>Emissions Unit P004</u> 0.51 lb/hr and 2.25 TPY from baghouse PDC-2.</p> <p><u>Emissions Unit P005</u> 0.51 lb/hr and 2.25 TPY from baghouse PDC-3.</p> <p><u>Emissions Unit P006</u> 0.09 lb/hr and 0.38 TPY from baghouse PDC-4.</p> <p><u>Emissions Unit P007</u> 0.12 lb/hr and 0.53 TPY from baghouse PDC-5.</p> <p>0.12 lb/hr and 0.53 TPY from baghouse PDC-6.</p> <p><u>Emissions Unit P008</u> 0.96 lbs/hr and 4.2 TPY from baghouse NDC-2.</p> <p><u>Emissions Unit P009</u> 0.65 lbs/hr and 2.85 TPY from baghouse NDC-3.</p> <p>Emissions from baghouse NDC-5 serving emissions units P003, P004, P005, P006, and P007 shall not exceed 0.86 lb/hr and 3.75 TPY.</p> <p>For emissions units P001, P002, P003, P004, P005, P006, P007, P008, and P009 the requirements of this rule also</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		include compliance with the requirements of OAC rule 3745-17-11(B)(1). See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01.	PE from the stacks serving the following emissions units shall not exceed: <u>Emissions Unit P010</u> 1.1 lbs/hr and 4.82 TPY from baghouses PDC-7 and NDC-6, combined. <u>Emissions Unit P011</u> 0.65 lb/hr and 2.85 TPY from baghouse NDC-7. <u>Emissions Unit P013</u> 0.48 lb/hr and 2.10 TPY from baghouse PDC-8. See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-17-07(A)(1)(a)	Visible particulate emissions from all stacks serving these emissions units shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	For emissions units P001, P002, P003, P004, P005, P006, P007, P008, and P009 the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). For emissions units P010, P011, and P013, PE from the stack serving these emissions units shall not exceed: <u>Emissions Unit P010</u> 2.57 lbs/hr from baghouses PDC-7 and NDC-6, combined. <u>Emissions Unit P011</u> 0.876 lb/hr from baghouse NDC-7. <u>Emissions Unit P013</u> 2.57 lbs/hr from baghouse PDC-8.

(2) Additional Terms and Conditions

- a. The hourly and annual emissions limitation for each emissions unit is based on each emissions unit potential to emit vented through its respective dust collection system (baghouse). Therefore, only the monitoring, record keeping or reporting requirements of the control equipment is necessary to ensure compliance with these emissions limitations.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 the 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- c. This rule paragraph applies 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 particulate emissions from this air contaminant source since the controlled potentials to emit for particulate emissions are each less than 10 tons/year.

- d. The emissions from these emissions units shall be vented to each respective baghouse at all times each emissions unit is in operation.

c) Operational Restrictions

- (1) None

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emissions limitations contained in this permit, the acceptable range established for the pressure drop across each baghouse is between 1 to 6 inches of water.

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

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

- (3) 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 units are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouses on weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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

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

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

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

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

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

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office, Division of Air Pollution Control by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

The PER shall include identification of the following:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions;

- c. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
- d. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
- e. each incident of deviation described in [a] (above) where a prompt investigation was not conducted;
- f. 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
- g. 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.

It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

(1) Compliance with the 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. PE from the stacks serving these emissions units, as regulated by OAC rule 3745-31-05(A)(3), shall not exceed:

i. Emissions Unit P001

1.27 lbs/hr and 5.56 TPY from baghouses NDC-4 and NDC-8.

Applicable Compliance Method

Compliance with the short term emission limitation shall be determined by multiplying the maximum outlet emission rate of the dust collector (0.02 gr/dscf) by the air flow capacity of the dust collection system (7400 acfm) by 60 minutes per hour and dividing by 7,000 grains per pound.

ii. Emissions Unit P002

1.97 lbs/hr and 8.63 TPY from baghouse NDC-1.

Applicable Compliance Method

Compliance with the short term emission limitation shall be determined by multiplying the maximum outlet emission rate of the dust collector (0.02

gr/dscf) by the air flow capacity of the dust collection system (11,500 acfm) by 60 minutes per hour and dividing by 7,000 grains per pound.

iii. Emissions Unit P003 and P008

P003: 0.51 lb/hr and 2.25 TPY from baghouse PDC-1.
P008: 0.96 lbs/hr and 4.2 TPY from baghouse NDC-2.

Applicable Compliance Method

Compliance with the short term emission limitation for P003 & P008 shall be determined by multiplying the maximum outlet emission rate of their respective dust collector (0.02 gr/dscf) by the air flow capacity of the dust collection system (3,000 acfm) by 60 minutes per hour and dividing by 7,000 grains per pound.

iv. Emissions Unit P004

0.51 lb/hr and 2.25 TPY from baghouse PDC-2.

Applicable Compliance Method

Compliance with the short term emission limitation shall be determined by multiplying the maximum outlet emission rate of the dust collector (0.02 gr/dscf) by the air flow capacity of the dust collection system (3,000 acfm) by 60 minutes per hour and dividing by 7,000 grains per pound.

v. Emissions Unit P005

0.51 lb/hr and 2.25 TPY from baghouse PDC-3.

Applicable Compliance Method

Compliance with the short term emission limitation shall be determined by multiplying the maximum outlet emission rate of the dust collector (0.02 gr/dscf) by the air flow capacity of the dust collection system (3,000 acfm) by 60 minutes per hour and dividing by 7,000 grains per pound.

vi. Emissions Unit P006 & P007

P006: 0.09 lb/hr and 0.38 TPY from baghouse PDC-4.
P007: 0.12 lb/hr and 0.53 TPY from baghouse PDC-5.
0.12 lb/hr and 0.53 TPY from baghouse PDC-6.

Applicable Compliance Method

Compliance with the short term emission limitation for P006 and P007 shall be determined by multiplying the maximum outlet emission rate of their respective dust collector (0.02 gr/dscf) by the air flow capacity of the dust collection system (500 acfm) by 60 minutes per hour and dividing by 7,000 grains per pound.

vii. Emissions Unit P009

0.65 lbs/hr and 2.85 TPY from baghouse NDC-3.

Applicable Compliance Method

Compliance with the short term emission limitation shall be determined by multiplying the maximum outlet emission rate of the dust collector (0.02 gr/dscf) by the air flow capacity of the dust collection system (3,800 acfm) by 60 minutes per hour and dividing by 7,000 grains per pound.

viii. Emissions Unit P010

1.1 lbs/hr and 4.82 TPY from baghouses PDC-7 and NDC-6, combined.

Applicable Compliance Method

Compliance with the short term emission limitation shall be determined by multiplying the maximum outlet emission rate of the dust collectors (0.02 gr/dscf) by the air flow capacity of the dust collection system (2800 acfm for PDC-7 and 3600 acfm for NDC-6) by 60 minutes per hour and dividing by 7,000 grains per pound and summing both results.

Emissions for PDC-7:

$0.02 \text{ gr/dscf} * 2800 \text{ cf/min} * 60 \text{ min/hr} / 7,000 \text{ grains/lb} = 0.48 \text{ lb PE/hr}$

Emissions for NDC-6:

$0.02 \text{ gr/dscf} * 3600 \text{ cf/min} * 60 \text{ min/hr} / 7,000 \text{ grains/lb} = 0.62 \text{ lb PE/hr}$

The annual emission limitation shall be determined by multiplying the hourly emission rate of 1.1 lbs/hr by 8,760 hours per year and dividing by 2,000 pounds per ton.

ix. Emissions Unit P011

0.65 lb/hr and 2.85 TPY from baghouse NDC-7.

Applicable Compliance Method

Compliance with the short term emission limitation shall be determined by multiplying the maximum outlet emission rate of the dust collector (0.02 gr/dscf) by the air flow capacity of the dust collection system (3,775 acfm) by 60 minutes per hour and dividing by 7,000 grains per pound

x. Emissions Unit P013

0.48 lb/hr and 2.10 TPY from baghouse PDC-8.

Applicable Compliance Method

Compliance with the short term emission limitation shall be determined by multiplying the maximum outlet emission rate of the dust collector (0.02 gr/dscf) by the air flow capacity of the dust collection system (2,800 acfm) by 60 minutes per hour and dividing by 7,000 grains per pound.

xi. Emissions Limitation

Emissions from baghouse NDC-5 serving emissions units P003, P004, P005, P006, and P007 shall not exceed 0.86 lb/hr and 3.75 TPY.

Applicable Compliance Method

Compliance with the short term emission limitation shall be determined by multiplying the maximum outlet emission rate of the dust collector (0.02 gr/dscf) by the air flow capacity of the dust collection system (5,000 acfm) by 60 minutes per hour and dividing by 7,000 grains per pound.

For emissions units P001 through P011 and P013, compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 for emissions units P001 through P011 and P013

b. Emission Limitation

Visible particulate emissions from all stacks serving these emissions units shall not exceed 20 percent opacity as a six-minute average, except as provided by rule..

Applicable Compliance Method

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

c. Emission Limitation

PE from the stacks serving these emissions units, as regulated by OAC rule 3745-17-11(B)(1), shall not exceed the following:

- i. Emissions Unit P010 & P013: 2.57 lbs/hr
- Emissions Unit P011: 0.876 lbs/hr

Applicable Compliance Method

The emission limitation for P010, P011, and P013 is established pursuant to the requirement specified in OAC rule 3745-17-11(A). Per Table I, the calculated SIP allowable rate is:

$$E = 4.10(P)^{0.67}$$

where P is process weight rate falling within the range 0.05 tons/hr < P < 30 tons/hr.

For P010 & P013

$$P = 0.50 \text{ ton/hr} \quad E = 2.57 \text{ lbs/hr}$$

For P011

$$P = 0.10 \text{ ton/hr} \quad E = 0.876 \text{ lb/hr}$$

If required, the permittee shall demonstrate compliance with these emission limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

g) Miscellaneous Requirements

- (1) None.