

Synthetic Minor Determination and/or  Netting Determination

Permit To Install: **03-17055**

**A. Source Description**

This permit addresses eighteen mixers and filling operations (P001, P005-8, P014-15, P017-24, P026-28), facility wide cleanup emissions (P029) and ten storage tanks (T004-10, T012-14) at Ashland Specialty Chemical in Ashland, Ohio.

**B. Facility Emissions and Attainment Status**

The facility is potentially a major source for Title V and PSD for PE and OC emissions and MACT for HAP emissions. Ashland county is in attainment/unclassifiable for all criteria pollutants.

**C. Source Emissions**

**Potential OC Emissions:** The potential OC emissions are based on: (1) the maximum process weight rate, the appropriate emission factor and 8760 hours per year of operation [P001, P014, P022, P023, P026, P027]; or (2) the maximum daily emission rate allowed by OAC rule 3745-21-07(G)(2) [40 lbs/day] and 365 days per year of operation [P005-8, P015-21, P024, P028]; or (3) the maximum annual usage of cleanup materials (pounds) and the maximum OC content (lbs/lbs used) (numerous cleanup materials) [P029]; or the maximum annual throughput and the TANKS 4.0 program [T004-10, T012-14].

P001: (5625 lbs/hr) (0.814 lbs OC/1000 lbs) (8760 hr/yr) (ton/2000 lbs) = 20.05 tons/yr

P005: (40 lbs/day) (365 days/yr) (ton/2000 lbs) = 7.3 tons/yr

P006: (40 lbs/day) (365 days/yr) (ton/2000 lbs) = 7.3 tons/yr

P007: (40 lbs/day) (365 days/yr) (ton/2000 lbs) = 7.3 tons/yr

P008: (40 lbs/day) (365 days/yr) (ton/2000 lbs) = 7.3 tons/yr

P014: (8500 lbs/hr) (0.520 lbs OC/1000 lbs) (8760 hr/yr) (ton/2000 lbs) = 19.36 tons/yr

P015: (40 lbs/day) (365 days/yr) (ton/2000 lbs) = 7.3 tons/yr

P017: (40 lbs/day) (365 days/yr) (ton/2000 lbs) = 7.3 tons/yr

P018: (40 lbs/day) (365 days/yr) (ton/2000 lbs) = 7.3 tons/yr

P019: (40 lbs/day) (365 days/yr) (ton/2000 lbs) = 7.3 tons/yr

P020: (40 lbs/day) (365 days/yr) (ton/2000 lbs) = 7.3 tons/yr

P021: (40 lbs/day) (365 days/yr) (ton/2000 lbs) = 7.3 tons/yr

P022: (5427 lbs/hr) (2.211 lbs OC/1000 lbs) (8760 hr/yr) (ton/2000 lbs) = 52.56 tons/yr

P023: (5181 lbs/hr) (2.702 lbs OC/1000 lbs) (8760 hr/yr) (ton/2000 lbs) = 61.32 tons/yr

P024: (40 lbs/day) (365 days/yr) (ton/2000 lbs) = 7.3 tons/yr

P026: (800 lbs/hr) (1.778 lbs OC/1000 lbs) (8760 hr/yr) (ton/2000 lbs) = 6.23 tons/yr

P027: (5350 lbs/hr) (1.778 lbs OC/1000 lbs) (8760 hr/yr) (ton/2000 lbs) = 41.66

P028: (40 lbs/day) (365 days/yr) (ton/2000 lbs) = 7.3 tons/yr

P029: 1.61 tons/yr

T004: 1.02 tons/yr

T005: 0.44 tons/yr

T006: 0.085 tons/yr

T007: 0.95 tons/yr

T008: 0.048 tons/yr

T009: 0.23 tons/yr

T010: 0.86 tons/yr

T012: 0.48 tons/yr

T013: 0.48 tons/yr

T014: 0.48 tons/yr

**TOTAL OC EMISSIONS: 295.46 tons/yr**

**Potential PE:** The potential PE are based on the maximum process weight rate, the solids content, the percentage of the solids that are flake or powder, the percentage of the powder or flake that is emitted and 8760 hours of operation per year. Emission unit P008 is controlled with a 90% control efficiency.

P005: (1042 lbs/hr) (30% solids content) (100% solids that are flake or powder) (0.5% flake or powder emitted) (8760 hr/yr) (ton/2000 lbs) = 6.83 tons/yr

P006: (5500 lbs/hr) (30% solids content) (100% solids that are flake or powder) (0.5% flake or powder emitted) (8760 hr/yr) (ton/2000 lbs) = 36.14 tons/yr  
P007: (1050 lbs/hr) (20% solids content) (100% solids that are flake or powder) (0.5% flake or powder emitted) (8760 hr/yr) (ton/2000 lbs) = 4.60 tons/yr  
P008: (2500 lbs/hr) (30% solids content) (100% solids that are flake or powder) (0.5% flake or powder emitted) (8760 hr/yr) (ton/2000 lbs) (1-0.90) = 1.66 tons/yr  
P018: (2450 lbs/hr) (60% solids content) (50% solids that are flake or powder) (0.5% flake or powder emitted) (8760 hr/yr) (ton/2000 lbs) = 16.12 tons/yr  
P019: (2000 lbs/hr) (50% solids content) (50% solids that are flake or powder) (0.5% flake or powder emitted) (8760 hr/yr) (ton/2000 lbs) = 10.95 tons/yr  
P020: (1467 lbs/hr) (46% solids content) (50% solids that are flake or powder) (0.5% flake or powder emitted) (8760 hr/yr) (ton/2000 lbs) = 7.40 tons/yr  
P021: (7500 lbs/hr) (60% solids content) (40% solids that are flake or powder) (0.5% flake or powder emitted) (8760 hr/yr) (ton/2000 lbs) = 39.42 tons/yr  
P024: (11,250 lbs/hr) (50% solids content) (100% solids that are flake or powder) (0.5% flake or powder emitted) (8760 hr/yr) (ton/2000 lbs) = 123.19 tons/yr  
P026: (1600 lbs/hr) (46% solids content) (100% solids that are flake or powder) (0.5% flake or powder emitted) (8760 hr/yr) (ton/2000 lbs) = 16.12 tons/yr  
P027: (5350 lbs/hr) (60% solids content) (50% solids that are flake or powder) (0.5% flake or powder emitted) (8760 hr/yr) (ton/2000 lbs) = 35.17 tons/yr  
P028: (3100 lbs/hr) (50% solids content) (0% solids that are flake or powder) (0.5% flake or powder emitted) (8760 hr/yr) (ton/2000 lbs) = 33.95 tons/yr

**TOTAL PE: 331.55 tons/yr**

**Potential HAPs Emissions:** The potential emissions from P001, P005-8, P014-15, P017-24, P026-28, P029, T004-10, T012-14 are greater than 10 tons/yr for individual HAPs and 25 tons/yr for aggregate HAPs.

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**Restricted OC Emissions:** The facility would trigger the Title V and PSD threshold for OC emissions if the potential emissions of P001, P005-8, P014-15, P017-24, P026-28 were used to establish the emissions units' limits. The facility, however, wishes to avoid triggering Title V and PSD thresholds for criteria pollutants. To accomplish this, synthetic minor restrictions were required. The facility has accepted federally enforceable restrictions on annual emissions (49.90 tons of OC per rolling, 12-month period) to reduce their OC emissions below the Title V and PSD thresholds.

**Restricted PE:** The facility would trigger the Title V and PSD threshold for PE emissions if the potential emissions of P001, P005-8, P018-21, P024 P026-28 were used to establish the emissions units' limits. The facility, however, wishes to avoid triggering Title V and PSD thresholds for criteria pollutants. To accomplish this, synthetic minor restrictions were required. The facility has accepted federally enforceable restrictions on quantity of flake/powder solids processed (maximum rolling, 12-month quantity of flake/powder solids processed shall not exceed 9980 tons) to reduce their PE emissions below the Title V and PSD thresholds.

**Restricted HAPs Emissions:** The facility would trigger the Title V and MACT thresholds for HAPs emissions if the potential emissions of P001, P005-8, P014-15, P017-24, P026-29, T004-10, T012-14 were used to establish the emissions units' limits. The facility, however, wishes to avoid triggering Title V and MACT thresholds for HAPs. To accomplish this, synthetic minor restrictions were required. The facility has accepted the following federally enforceable restrictions on HAPs emissions: Annual HAP emissions resulting from P001, P005-8, P014-15, P017-24, P026-29, T004-10, T012-14 combined shall not exceed 10 tons per rolling 12-month period for any individual HAP or 25 tons per rolling 12-month period for any combination of HAPs.

#### **D. Conclusion**

With the restrictions on the annual OC and HAPs emissions and on the quantity of flake/powder solids produced, the OC, PE and HAP emissions will be below the Title V, PSD and MACT thresholds. Therefore, the facility will not be subject to Title V, PSD or MACT requirements.



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No:** 03-17055

**Fac ID:** 0303010043

**DATE:** 10/5/2006

Ashland Specialty Chemicals  
Richard Wright  
5200 Blazer Parkway  
Dublin, OH 43216

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$12400** will be due. Please do not submit any payment now.

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

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

NWDO

**ASHLAND  
COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 03-17055 FOR AN AIR CONTAMINANT SOURCE FOR  
Ashland Specialty Chemicals**

On 10/5/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Ashland Specialty Chemicals**, located at **1745 Cottage St, Ashland, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17055:

**Synthetic minor permit for mixing/filling/seal operations and storage tanks.**

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

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402  
[(419)352-8461]



**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 03-17055**

Application Number: 03-17055  
Facility ID: 0303010043  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Ashland Specialty Chemicals  
Person to Contact: Richard Wright  
Address: 5200 Blazer Parkway  
Dublin, OH 43216

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1745 Cottage St  
Ashland, Ohio**

Description of proposed emissions unit(s):

**Synthetic minor permit for mixing/filling/seal operations and storage tanks.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

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

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

**3. Records Retention Requirements**

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

**4. Inspections and Information Requests**

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

**Ashland Specialty Chemicals**

**Facility ID: 0303010043**

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

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

**Ashland Specialty Chemicals****Facility ID: 0303010043****PTI Application: 03-17055****Issued: To be entered upon final issuance**

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

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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

**Ashland Specialty Chemicals**  
**PTI Application: 03-17055**  
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**Facility ID: 0303010043**

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

#### **14. Construction Compliance Certification**

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

#### **15. Fees**

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

### **B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	56.58
PE	29.90
Individual HAPs	9.90
Combined HAPs	24.90

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P001) - 3200-gallon mixer and container filling equipment (mixer no. 4) Modification of an existing emission unit to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	49.90 tons of organic compounds (OC) per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined (See A.2.a.i and B.1)  Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.a.ii)
OAC rule 3745-21-07(G)	None (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
  - i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.

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- ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.b** OAC rule 3745-21-01(G)(2) does not apply because the emission unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

**B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021,

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P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$\sum_{i=1}^n \frac{C_i U_i}{2000} \leq 49.90$$

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

C<sub>i</sub> = OC emission factor, in lbs OC per lb of material i processed;

U<sub>i</sub> = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

Month	$\sum_{i=1}^n \frac{C_i U_i}{2000}$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

Emissions Unit ID: P001

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;

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- c. the number of pounds of each material processed or stored;
- d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
- e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
- f. the total HAP emission rate for all HAPs, combined, from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
- g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs, combined, in tons; and
- h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs, combined, in tons.

**D. Reporting Requirements**

- 1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
  - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.a.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, P029, T004, T005,

Emissions Unit ID: P001

T006, T007, T008, T009, T010, T012, T013, and T014, combined.

- d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.a.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

## E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

## F. Miscellaneous Requirements

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P005) - 1200 gallon mixer (mixer no. 18)  
Modification of PTI #03-783, issued on June 15, 1979, to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	<p>49.90 tons of organic compounds (OC) per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.a.i and B.1)</p> <p>Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.a.ii)</p> <p>29.90 tons of particulate emissions (PE) per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined (See A.2.a.iii and B.2)</p>
OAC rule 3745-17-07(A)	See A.2.b.
OAC rule 3745-17-11(B)	See A.2.c.
OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

**2. Additional Terms and Conditions**

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:

Emissions Unit ID: P005

- i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
- ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons):

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- iii. 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined (See B.2).

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- 2.b** This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.

**B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$\sum_{i=1}^{12} \sum_{j=1}^n [C_i U_j] \div 2000 \text{ lbs/ton} \leq 49.90$$

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

C<sub>i</sub> = OC emission factor, in lbs OC per lb of material i processed;

U<sub>i</sub> = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019,

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P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

<b>Month</b>	$\frac{\sum_{i=1}^n C_i U_i}{2000}$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

- The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the levels specified in the following table:

<b><u>Month(s)</u></b>	<b><u>Maximum Allowable Cumulative Amount of Flake/Powder Processed (tons)</u></b>
1	2,000
1-2	4,000
1-3	6,000
1-4	8,000
1-12	9,980

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of flake/powder solids processed restriction shall be based upon a rolling, 12-month summation.

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**Emissions Unit ID: P005**

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**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.
  
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;

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- e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
3. The permittee shall collect and record the following information each month for flake/powder solids processed in emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined:
- a. The name and identification number of each flake/powder solid processed;
  - b. The amount of each flake/powder solid processed, in pounds;
  - c. the PE emission rate, in pounds, for each flake/powder solid processed calculated using the following equation:  
  

$$E = U \times 0.005$$

where,

E = PE emissions, in pounds, from each flake/powder solid processed;

U = the amount, in pounds, of each flake/powder solid processed (C.2.b)

0.005 = an emission rate of 0.5% pound PE per pound of flake/powder solid processed
  - d. The total PE emission rate from all flake/powder solids processed (summation of C.2.c for all flake/powder solids processed), in pounds or tons;

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- e. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total PE emissions, in tons;
  - f. beginning the first month, after the first 12 months of operation following under the provisions of this permit, the rolling, 12-month PE emission rates, in tons.
  - g. during the first 12 calendar months of operation under the provisions of this permit, the cumulative year-to-date amount of flake/powder solids processed, in pounds; and
  - h. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the amount of flake/powder solid processed in pounds.
4. The permittee shall collect and record the following information for each day for this emission unit:
- a. the company identification for each material processed;
  - b. the number of pounds of each material processed;
  - c. the organic compound content of each material processed, in pounds per pounds material processed;
  - d. the total organic compound emission rate for all material processed, in pounds per day (summation of (b) x (c) for all materials processed);
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all material processed, i.e., (d)/(e), in pounds per hour (average).

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027,

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and P028, combined.

- b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
- c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.a.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
- d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.a.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
- e. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined
- f. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month restriction on the amount of flake/powder solid processed of 9,980 pounds.
- g. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative flake/powder solid processing rates specified in section B.2.
- h. An identification of each day during which the average hourly organic compound emissions from the products produced in this emission unit exceeded 8 pounds per hour, and the actual average hourly organic compound emission for each such day; and
- i. An identification of each day during which the organic compound emissions from the products produced in this emission unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- c. Emission Limitation: 29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

- d. Emission Limitations: OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.

- e. Emission Limitation: The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons

**Ashland Specialty Chemicals**  
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Emissions Unit ID: **P005**

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

**F. Miscellaneous Requirements**

None

Issued: To be entered upon final issuance

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P006) - 1400 gallon mixer and container filling equipment (mixer no. 10) Modification of PTI #03-10248, issued on July 22, 1998, to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	7.3 tons organic compounds (OC)/yr  8.25 lbs particulate emissions (PE)/hr  0% opacity, as a six-minute average  See A.2.a
OAC rule 3745-31-05(C)	49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.b.i and B.1)  Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.ii)  29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined (See A.2.b.iii and B.2)
OAC rule 3745-17-07(A)	See A.2.c.
OAC rule 3745-17-11(B)	See A.2.d.

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**Issued: To be entered upon final issuance**

OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day
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**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
  - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<b><u>Month(s)</u></b>	<b><u>Individual HAP</u></b>	<b><u>Combined HAPs</u></b>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88

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1-12	9.90	24.90
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After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

iii. 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined (See B.2).

**2.c** This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

**2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.

**2.e** The hourly emission limitation of 8.25 lbs PE/hr represents the potential to emit for this emission unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

**B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$\sum_{i=1}^n C_i U_i \div 2000 \text{ lbs/ton} \leq 49.90$$

M=1

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

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$C_i$  = OC emission factor, in lbs OC per lb of material i processed;

$U_i$  = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

Month	$\sum_{i=1}^n [C_i U_i] \div 2000$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

- The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the levels specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative Amount of Flake/Powder Processed (tons)</u>
1	2,000
1-2	4,000
1-3	6,000
1-4	8,000
1-12	9,980

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of flake/powder solids processed restriction shall be based upon a rolling, 12-month summation.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.
2. The permittee shall collect and record the following HAP information each month for

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emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:

- a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
3. The permittee shall collect and record the following information each month for flake/powder solids processed in emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined:
- a. The name and identification number of each flake/powder solid processed;
  - b. The amount of each flake/powder solid processed, in pounds;
  - c. the PE emission rate, in pounds, for each flake/powder solid processed calculated using the following equation:

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$$E = U \times 0.005$$

where,

E = PE emissions, in pounds, from each flake/powder solid processed;

U = the amount, in pounds, of each flake/powder solid processed (C.2.b)

0.005 = an emission rate of 0.5% pound PE per pound of flake/powder solid processed

- d. The total PE emission rate from all flake/powder solids processed (summation of C.2.c for all flake/powder solids processed), in pounds or tons;
  - e. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total PE emissions, in tons;
  - f. beginning the first month, after the first 12 months of operation following under the provisions of this permit, the rolling, 12-month PE emission rates, in tons.
  - g. during the first 12 calendar months of operation under the provisions of this permit, the cumulative year-to-date amount of flake/powder solids processed, in pounds; and
  - h. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the amount of flake/powder solid processed in pounds.
4. The permittee shall collect and record the following information for each day for this emission unit:
- a. the company identification for each material processed;
  - b. the number of pounds of each material processed;
  - c. the organic compound content of each material processed, in pounds per pounds material processed;
  - d. the total organic compound emission rate for all material processed, in pounds per day (summation of (b) x (c) for all materials processed);

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- e. the total number of hours the emissions unit was in operation;
  - f. the average hourly organic compound emission rate for all material processed, i.e., (d)/(e), in pounds per hour (average); and
  - g. the annual year to date OC emissions for all materials processed (summation of (d) for each day to date from January to December).
5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

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**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
  - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - e. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined
  - f. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month restriction on the amount of flake/powder solid processed of 9,980 pounds.
  - g. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative flake/powder solid processing rates specified in section B.2.

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- h. An identification of each day during which the average hourly organic compound emissions from the products produced in this emission unit exceeded 8 pounds per hour, and the actual average hourly organic compound emission for each such day.
- i. An identification of each day during which the organic compound emissions from the products produced in this emission unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

- 2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

- 1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 7.3 tons OC/yr  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.
  - b. Emission Limitation: 8.25 lbs PE/hr  
  
Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

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\*The potential to emit is based on a maximum process weight rate of 5500 lbs/hr, a 30% solids content, an assumption that 100% of the solids are flake or powder and that 0.5% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

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- c. Emission Limitation: 0% opacity, as a 6-minute average

Applicable Compliance Method: If required, compliance with the particulate emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- d. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- e. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- f. Emission Limitation: 29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

- g. Emission Limitations: OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.

- h. Emission Limitation: The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined, shall not exceed 9980 tons

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3

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**F. Miscellaneous Requirements**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P007) - 750 gallon mixer and container filling equipment (mixer no. 1) Modification of PTI #03-10248, issued on July 22, 1998, to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	7.3 tons organic compounds (OC)/yr  1.05 lbs particulate emissions (PE)/hr  0% opacity, as a six-minute average  See A.2.a
OAC rule 3745-31-05(C)	49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.b.i and B.1)  Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.ii)  29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined (See A.2.b.iii and B.2)
OAC rule 3745-17-07(A)	See A.2.c.
OAC rule 3745-17-11(B)	See A.2.d.

**Ashland Specialty Chemicals**  
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**Facility ID: 0303010043**

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OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day
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**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
  - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80

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1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- iii. 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined (See B.2).

**2.c** This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

**2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.

**2.e** The hourly emission limitation of 1.05 lbs PE/hr represents the potential to emit for this emission unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

**B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$\sum_{i=1}^{12} \sum_{j=1}^n [C_i U_j] \div 2000 \text{ lbs/ton} \leq 49.90$$

M=1 i=1

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001,

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P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

$C_i$  = OC emission factor, in lbs OC per lb of material  $i$  processed;

$U_i$  = pounds of material  $i$  processed;

Material  $i$ , is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material  $i$ , non-container filling of solvent borne material would be defined as another material  $i$ , etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

Month	$\sum_{i=1}^n [C_i U_i] \div 2000$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

- The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the levels specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative Amount of Flake/Powder Processed (tons)</u>
1	2,000
1-2	4,000
1-3	6,000
1-4	8,000
1-12	9,980

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of flake/powder solids processed restriction shall be based upon a rolling, 12-month summation.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.

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2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
3. The permittee shall collect and record the following information each month for flake/powder solids processed in emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each flake/powder solid processed;
  - b. The amount of each flake/powder solid processed, in pounds;
  - c. the PE emission rate, in pounds, for each flake/powder solid processed calculated using the following equation:

$$E = U \times 0.005$$

where,

E = PE emissions, in pounds, from each flake/powder solid processed;

U = the amount, in pounds, of each flake/powder solid processed (C.2.b)

0.005 = an emission rate of 0.5% pound PE per pound of flake/powder solid processed

- d. The total PE emission rate from all flake/powder solids processed (summation of C.2.c for all flake/powder solids processed), in pounds or tons;
  - e. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total PE emissions, in tons;
  - f. beginning the first month, after the first 12 months of operation following under the provisions of this permit, the rolling, 12-month PE emission rates, in tons.
  - g. during the first 12 calendar months of operation under the provisions of this permit, the cumulative year-to-date amount of flake/powder solids processed, in pounds; and
  - h. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the amount of flake/powder solid processed in pounds.
4. The permittee shall collect and record the following information for each day for this emission unit:
- a. the company identification for each material processed;
  - b. the number of pounds of each material processed;
  - c. the organic compound content of each material processed, in pounds per pounds material processed;
  - d. the total organic compound emission rate for all material processed, in pounds per day (summation of (b) x (c) for all materials processed);

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- e. the total number of hours the emissions unit was in operation;
  - f. the average hourly organic compound emission rate for all material processed, i.e., (d)/(e), in pounds per hour (average);
  - g. the annual year to date OC emissions for all materials processed (summation of (d) for each day to date from January to December).
5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

**Issued: To be entered upon final issuance****Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
  - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - e. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined
  - f. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month restriction on the amount of flake/powder solid processed of 9,980 pounds.
  - g. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative flake/powder solid processing rates specified in section B.2.
  - h. An identification of each day during which the average hourly organic compound emissions from the products produced in this emission unit exceeded 8 pounds per hour, and the actual average hourly organic compound emission for each such day; and

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- i. An identification of each day during which the organic compound emissions from the products produced in this emission unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

## Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 7.3 tons OC/yr

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.

- b. Emission Limitation: 1.05 lbs PE/hr

Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a maximum process weight rate of 1050 lbs/hr, a 20% solids content, an assumption that 100% of the solids are flake or powder and that 0.5% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

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Emissions Unit ID: **P007**

**Issued: To be entered upon final issuance**

- c. Emission Limitation: 0% opacity, as a 6-minute average

Applicable Compliance Method: If required, compliance with the particulate emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- d. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- e. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- f. Emission Limitation: 29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

- g. Emission Limitations: OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.

- h. Emission Limitation: The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

**Miscellaneous Requirements**

**Ashland Specialty Chemicals**  
DTI Application: 03 17055

**Facility ID: 0303010043**

**Emissions Unit ID: P007**

None

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## II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment - (P008) - 3760 gallon mixer and container filling equipment (mixer no. 19) Modification of PTI #03-10248, issued on July 22, 1998, to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
45-31-05(A)(3)	7.3 tons organic compounds (OC)/yr  0.38 lb particulate emissions (PE)/hr  0% opacity, as a six-minute average  See A.2.a
45-31-05(C)	49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.b.i and B.1)  Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.ii)  29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined (See A.2.b.iii and B.2)
45-17-07(A)	See A.2.c.
45-17-11(B)	See A.2.d.
45-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

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Emissions Unit ID: **P008**

**Issued: To be entered upon final issuance****Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
  - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<b><u>Month(s)</u></b>	<b><u>Individual HAP</u></b>	<b><u>Combined HAPs</u></b>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

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After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

iii. 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined (See B.2).

2.c This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.d The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.

2.e The hourly emission limitation of 0.38 lb PE/hr represents the potential to emit for this emission unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

Operational Restrictions

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

12 n
[ C\_i U\_i ] ÷ 2000 lbs/ton ≤ 49.90
M=1 i=1

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

C\_i = OC emission factor, in lbs OC per lb of material i processed;

U\_i = pounds of material i processed;

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Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc).

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

<b>Month</b>	$\frac{\sum_{i=1}^n C_i U_i}{2000}$
	is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

2. The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Amount of Flake/Powder Processed (tons)</u>
1	2,000
1-2	4,000
1-3	6,000

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1-4	8,000
1-12	9,980

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of flake/powder solids processed restriction shall be based upon a rolling, 12-month summation.

### Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.
  
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;

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- d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
- e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
- f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
- g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
- h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

3. The permittee shall collect and record the following information each month for flake/powder solids processed in emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined:

- a. The name and identification number of each flake/powder solid processed;
- b. The amount of each flake/powder solid processed, in pounds;
- c. the PE emission rate, in pounds, for each flake/powder solid processed calculated using the following equation:

$$E = U \times 0.005$$

where,

E = PE emissions, in pounds, from each flake/powder solid processed;

U = the amount, in pounds, of each flake/powder solid processed (C.2.b)

0.005 = an emission rate of 0.5% pound PE per pound of flake/powder solid processed

- d. The total PE emission rate from all flake/powder solids processed (summation of C.2.c for all flake/powder solids processed), in pounds or tons;
- e. for the first 12 months of operation, under the provisions of this permit, the cumulative

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year-to-date total PE emissions, in tons;

- f. beginning the first month, after the first 12 months of operation following under the provisions of this permit, the rolling, 12-month PE emission rates, in tons.
- g. during the first 12 calendar months of operation under the provisions of this permit, the cumulative year-to-date amount of flake/powder solids processed, in pounds; and
- h. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the amount of flake/powder solid processed in pounds.

- 4. The permittee shall collect and record the following information for each day for this emission unit:
  - a. the company identification for each material processed;
  - b. the number of pounds of each material processed;
  - c. the organic compound content of each material processed, in pounds per pounds material processed;
  - d. the total organic compound emission rate for all material processed, in pounds per day (summation of (b) x (c) for all materials processed);
  - e. the total number of hours the emissions unit was in operation;
  - f. the average hourly organic compound emission rate for all material processed, i.e., (d)/(e), in pounds per hour (average); and
  - g. the annual year to date OC emissions for all materials processed (summation of (d) for each day to date from January to December).
- 5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and

- c. any corrective actions taken to eliminate the visible emissions.

#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
  - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - e. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined
  - f. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month restriction on the amount of flake/powder solid processed of 9,980 pounds.

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- g. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative flake/powder solid processing rates specified in section B.2.
- h. An identification of each day during which the average hourly organic compound emissions from the products produced in this emission unit exceeded 8 pounds per hour, and the actual average hourly organic compound emission for each such day; and
- i. An identification of each day during which the organic compound emissions from the products produced in this emission unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

- 2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

- 1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 7.3 tons OC/yr  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.
  - b. Emission Limitation: 0.38 lb PE/hr  
  
Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation

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reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a maximum process weight rate of 2500 lbs/hr, a 30% solids content, an assumption that 100% of the solids are flake or powder and that 0.05% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation: 0% opacity, as a 6-minute average

Applicable Compliance Method: If required, compliance with the particulate emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- d. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- e. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- f. Emission Limitation: 29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

- g. Emission Limitations: OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

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Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.

- h. Emission Limitation: The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

**F. Miscellaneous Requirements**

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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

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

**Operations, Property, and/or Equipment - (P014) - Small container filling line Modification of PTI #03-16055, issued on March 18, 2004, to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	4.42 lbs organic compounds (OC)/hr  See A.2.a
OAC rule 3745-31-05(C)	49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.b.i and B.1)  Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.ii)
OAC rule 3745-21-07(G)	None (see A.2.c).

**2. Additional Terms and Conditions**

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:

Emissions Unit ID: **P014**

- i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
- ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.c OAC rule 3745-21-01(G)(2) does not apply because the emission unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

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- 2.d** The hourly emission limitation of 4.42 lbs OC/hr represents the potential to emit for this emission unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

**B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$\sum_{i=1}^{12} n [C_i U_i] \div 2000 \text{ lbs/ton} \leq 49.90$$

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

C<sub>i</sub> = OC emission factor, in lbs OC per lb of material i processed;

U<sub>i</sub> = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

<b>Month</b>	$\sum_{i=1}^n [\sum C_i \sum U_i] \div 2000$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.

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2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027,

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and P028, combined.

- b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
- c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
- d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 4.42 lbs OC/hr

Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a maximum process weight rate of 8500 pounds per hour and a maximum OC content of 0.520 pounds per 1000 pounds.

If required, compliance with the organic compound emission limitation shall be determined in accordance with Methods 1-4 and 18, 25 or 25A, as applicable, of 40 CFR, Part 60, Appendix A.

Emissions Unit ID: P014

- b. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- c. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

## F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P015) - PLIOSEAL extrusion line Modification of PTI #03-7581, issued on February 2, 1994, to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	<p>49.90 tons of organic compounds (OC) per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.a.i and B.1)</p> <p>Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.a.ii)</p>
OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

**2. Additional Terms and Conditions**

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
  - i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.

Emissions Unit ID: P015

- ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**B. Operational Restrictions**

- 1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$\frac{\sum_{i=1}^{12} (C_i + U_i)}{2000 \text{ lbs/ton}} \leq 49.90$$

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$$M=1 \quad i=1$$

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

C<sub>i</sub> = OC emission factor, in lbs OC per lb of material i processed;

U<sub>i</sub> = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

Month	$\frac{M}{1} \sum_{i=1}^n [C_i U_i] \div 2000$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;

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- e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
- f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
- g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
- h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

3. The permittee shall collect and record the following information for each day for this emission unit:

- a. the company identification for each material processed;
- b. the number of pounds of each material processed;
- c. the organic compound content of each material processed, in pounds per pounds material processed;
- d. the total organic compound emission rate for all material processed, in pounds per day (summation of (b) x (c) for all materials processed);
- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly organic compound emission rate for all material processed, i.e., (d)/(e), in pounds per hour (average).

**D. Reporting Requirements**

- 1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027,

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and P028, combined.

- b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
- c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.a.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
- d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.a.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
- e. An identification of each day during which the average hourly organic compound emissions from the products produced in this emission unit exceeded 8 pounds per hour, and the actual average hourly organic compound emission for each such day; and
- f. An identification of each day during which the organic compound emissions from the products produced in this emission unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

**E. Testing Requirements**

- 1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

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Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- c. Emission Limitations: OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.

## F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition

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of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P017) - PLIOSEAL mixer line (five PLIOSEAL mixers) Modification of PTI #03-7581, issued on February 2, 1994, to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	<p>49.90 tons of organic compounds (OC) per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.a.i and B.1)</p> <p>Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.a.ii)</p>
OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

**2. Additional Terms and Conditions**

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
  - i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined, (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits

VOC.

- ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<b><u>Month(s)</u></b>	<b><u>Individual HAP</u></b>	<b><u>Combined HAPs</u></b>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

12 n

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$$\sum_{i=1}^n \sum_{M=1}^M [C_i U_i] \div 2000 \text{ lbs/ton} \leq 49.90$$

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

C<sub>i</sub> = OC emission factor, in lbs OC per lb of material i processed;

U<sub>i</sub> = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

Month	$\sum_{i=1}^n \sum_{M=1}^M [C_i U_i] \div 2000$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

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**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.
  
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;

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- e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
- f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
- g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
- h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

3. The permittee shall collect and record the following information for each day for this emission unit:

- a. the company identification for each material processed;
- b. the number of pounds of each material processed;
- c. the organic compound content of each material processed, in pounds per pounds material processed;
- d. the total organic compound emission rate for all material processed, in pounds per day (summation of (b) x (c) for all materials processed);
- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly organic compound emission rate for all material processed, i.e., (d)/(e), in pounds per hour (average).

#### D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014,

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P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined.

- b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
- c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.a.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
- d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.a.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
- e. An identification of each day during which the average hourly organic compound emissions from the products produced in this emission unit exceeded 8 pounds per hour, and the actual average hourly organic compound emission for each such day; and
- f. An identification of each day during which the organic compound emissions from the products produced in this emission unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

**E. Testing Requirements**

- 1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Emissions Unit ID: P017

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- c. Emission Limitations: OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.

## F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P018) - 523 gallon mixer and container filling equipment (mixer no. 2) Modification of PTI #03-9708, issued on May 13, 2004, to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	3.68 lbs particulate emissions (PE)/hr  No visible emissions  See A.2.a
OAC rule 3745-31-05(C)	49.90 tons of organic compounds (OC) per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.b.i and B.1)  Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.ii)  29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined (See A.2.b.iii and B.2)
OAC rule 3745-17-07(A)	See A.2.c.
OAC rule 3745-17-11(B)	See A.2.d.
OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

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Emissions Unit ID: **P018**

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
  - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<b><u>Month(s)</u></b>	<b><u>Individual HAP</u></b>	<b><u>Combined HAPs</u></b>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80

Emissions Unit ID: P018

1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

iii. 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined (See B.2).

**2.c** This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

**2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.

**2.e** The hourly emission limitation of 3.68 lbs PE/hr represents the potential to emit for this emission unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

**B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$M \sum_{i=1}^{12} n [C_i + U_i] \div 2000 \text{ lbs/ton} \leq 49.90$$

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020,

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P021, P022, P023, P024, P026, P027, and P028

$C_i$  = OC emission factor, in lbs OC per lb of material  $i$  processed;

$U_i$  = pounds of material  $i$  processed;

Material  $i$ , is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material  $i$ , non-container filling of solvent borne material would be defined as another material  $i$ , etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

Month	$\sum_{i=1}^n [C_i U_i] \div 2000$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

- The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the levels specified in the following table:

Emissions Unit ID: P018

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Amount of Flake/Powder Processed (tons)</u>
1	2,000
1-2	4,000
1-3	6,000
1-4	8,000
1-12	9,980

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of flake/powder solids processed restriction shall be based upon a rolling, 12-month summation.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020,

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P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:

- a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
3. The permittee shall collect and record the following information each month for flake/powder solids processed in emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined:
- a. The name and identification number of each flake/powder solid processed;
  - b. The amount of each flake/powder solid processed, in pounds;
  - c. the PE emission rate, in pounds, for each flake/powder solid processed calculated using the following equation:

$$E = U(0.005)$$

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where,

E = PE emissions, in pounds, from each flake/powder solid processed;

U = the amount, in pounds, of each flake/powder solid processed (C.2.b)

0.005 = an emission rate of 0.5% pound PE per pound of flake/powder solid processed

- d. The total PE emission rate from all flake/powder solids processed (summation of C.2.c for all flake/powder solids processed), in pounds or tons;
  - e. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total PE emissions, in tons;
  - f. beginning the first month, after the first 12 months of operation following under the provisions of this permit, the rolling, 12-month PE emission rates, in tons.
  - g. during the first 12 calendar months of operation under the provisions of this permit, the cumulative year-to-date amount of flake/powder solids processed, in pounds; and
  - h. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the amount of flake/powder solid processed in pounds.
4. The permittee shall collect and record the following information for each day for this emission unit:
- a. the company identification for each material processed;
  - b. the number of pounds of each material processed;
  - c. the organic compound content of each material processed, in pounds per pounds material processed;
  - d. the total organic compound emission rate for all material processed, in pounds per day (summation of (b) x (c) for all materials processed);
  - e. the total number of hours the emissions unit was in operation; and

- f. the average hourly organic compound emission rate for all material processed, i.e., (d)/(e), in pounds per hour (average).
5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. the total duration of any visible emission incident; and
    - c. any corrective actions taken to eliminate the visible emissions.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
  - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions

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units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

- e. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined
- f. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month restriction on the amount of flake/powder solid processed of 9,980 pounds.
- g. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative flake/powder solid processing rates specified in section B.2.
- h. An identification of each day during which the average hourly organic compound emissions from the products produced in this emission unit exceeded 8 pounds per hour, and the actual average hourly organic compound emission for each such day; and
- i. An identification of each day during which the organic compound emissions from the products produced in this emission unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

- 2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

**E. Testing Requirements**

- 1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emissions Unit ID: P018

- a. Emission Limitation: 3.68 lbs PE/hr

Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a maximum process weight rate of 2450 lbs/hr, a 60% solids content, an assumption that 50% of the solids are flake or powder and that 0.5% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation: No visible emissions

Applicable Compliance Method: If required, compliance with the particulate emission limitation shall be determined in accordance with Method 22 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- d. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- e. Emission Limitation: 29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined

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Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

- f. Emission Limitations: OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.

- g. Emission Limitation: The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

**F. Miscellaneous Requirements**

None

Issued: To be entered upon final issuance

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P019) - 523 gallon mixer and container filling operations (mixer no. 3) Modification of PTI #03-9708, issued on May 13, 2004, to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	2.50 lbs particulate emissions (PE)/hr  No visible emissions  See A.2.a.
OAC rule 3745-31-05(C)	49.90 tons of organic compounds (OC) per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.b.i and B.1)  Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.ii)  29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined (See A.2.b.iii and B.2)
OAC rule 3745-17-07(A)	See A.2.c.
OAC rule 3745-17-11(B)	See A.2.d.
OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

**Ashland Specialty Chemicals**  
DTI Application: 03 17055

**Facility ID: 0303010043**

**Emissions Unit ID: P019**

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
  - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<b><u>Month(s)</u></b>	<b><u>Individual HAP</u></b>	<b><u>Combined HAPs</u></b>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80

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1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- iii. 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined (See B.2).

**2.c** This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

**2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.

**2.e** The hourly emission limitation of 2.50 lbs PE/hr represents the potential to emit for this emission unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

**B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$\sum_{i=1}^{12} \sum_{j=1}^n [C_i U_j] \div 2000 \text{ lbs/ton} \leq 49.90$$

M=1 i=1

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001,

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P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

$C_i$  = OC emission factor, in lbs OC per lb of material i processed;

$U_i$  = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

<b>Month</b>	$\sum_{i=1}^n [C_i U_i] \div 2000$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

2. The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the levels specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative Amount of Flake/Powder Processed (tons)</u>
1	2,000
1-2	4,000
1-3	6,000
1-4	8,000
1-12	9,980

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of flake/powder solids processed restriction shall be based upon a rolling, 12-month summation.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.
2. The permittee shall collect and record the following HAP information each month for

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emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:

- a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs, combined, from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
3. The permittee shall collect and record the following information each month for flake/powder solids processed in emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined:
- a. The name and identification number of each flake/powder solid processed;
  - b. The amount of each flake/powder solid processed, in pounds;
  - c. the PE emission rate, in pounds, for each flake/powder solid processed calculated using the following equation:

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$$E = (U \times 0.005)$$

where,

E = PE emissions, in pounds, from each flake/powder solid processed;

U = the amount, in pounds, of each flake/powder solid processed (C.2.b)

0.005 = an emission rate of 0.5% pound PE per pound of flake/powder solid processed

- d. The total PE emission rate from all flake/powder solids processed (summation of C.2.c for all flake/powder solids processed), in pounds or tons;
  - e. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total PE emissions, in tons;
  - f. beginning the first month, after the first 12 months of operation following under the provisions of this permit, the rolling, 12-month PE emission rates, in tons.
  - g. during the first 12 calendar months of operation under the provisions of this permit, the cumulative year-to-date amount of flake/powder solids processed, in pounds; and
  - h. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the amount of flake/powder solid processed in pounds.
4. The permittee shall collect and record the following information for each day for this emission unit:
- a. the company identification for each material processed;
  - b. the number of pounds of each material processed;
  - c. the organic compound content of each material processed, in pounds per pounds material processed;
  - d. the total organic compound emission rate for all material processed, in pounds per day (summation of (b) x (c) for all materials processed);

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- e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all material processed, i.e., (d)/(e), in pounds per hour (average).
5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
  - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and, combined, HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and

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combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

- e. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined
- f. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month restriction on the amount of flake/powder solid processed of 9,980 pounds.
- g. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative flake/powder solid processing rates specified in section B.2.
- h. An identification of each day during which the average hourly organic compound emissions from the products produced in this emission unit exceeded 8 pounds per hour, and the actual average hourly organic compound emission for each such day; and
- i. An identification of each day during which the organic compound emissions from the products produced in this emission unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

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- a. Emission Limitation: 2.50 lbs PE/hr

Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a maximum process weight rate of 2000 lbs/hr, a 50% solids content, an assumption that 50% of the solids are flake or powder and that 0.5% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation: No visible emissions

Applicable Compliance Method: If required, compliance with the particulate emission limitation shall be determined in accordance with Method 22 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- d. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- e. Emission Limitation: 29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined

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Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

- f. Emission Limitations: OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.

- g. Emission Limitation: The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

#### F. Miscellaneous Requirements

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P020) - 246 gallon mixer and container filling equipment (mixer no. 6) Modification of PTI #03-9708, issued on May 13, 2004, to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	1.69 lbs particulate emissions (PE)/hr  No visible emissions  See A.2.a.
OAC rule 3745-31-05(C)	49.90 tons of organic compounds (OC) per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.b.i and B.1)  Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.ii)  29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined (See A.2.b.iii and B.2)
OAC rule 3745-17-07(A)	See A.2.c.
OAC rule 3745-17-11(B)	See A.2.d.
OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

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**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined, (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
  - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<b><u>Month(s)</u></b>	<b><u>Individual HAP</u></b>	<b><u>Combined HAPs</u></b>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80

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1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

iii. 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined (See B.2).

**2.c** This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

**2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.

**2.e** The hourly emission limitation of 1.69 lbs PE/hr represents the potential to emit for this emission unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

**B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$\sum_{i=1}^{12} \sum_{n} [C_i + U_i] \div 2000 \text{ lbs/ton} \leq 49.90$$

M=1 i=1

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020,

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P021, P022, P023, P024, P026, P027, and P028

$C_i$  = OC emission factor, in lbs OC per lb of material i processed;

$U_i$  = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

Month	$\sum_{i=1}^n [C_i U_i] \div 2000$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

2. The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the levels specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative Amount of Flake/Powder Processed (tons)</u>
1	2,000
1-2	4,000
1-3	6,000
1-4	8,000
1-12	9,980

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of flake/powder solids processed restriction shall be based upon a rolling, 12-month summation.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.
2. The permittee shall collect and record the following HAP information each month for

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emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:

- a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs, combined, from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs, combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs, combined, in tons.
3. The permittee shall collect and record the following information each month for flake/powder solids processed in emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined:
- a. The name and identification number of each flake/powder solid processed;
  - b. The amount of each flake/powder solid processed, in pounds;
  - c. the PE emission rate, in pounds, for each flake/powder solid processed calculated using the following equation:

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$$E = U \times 0.005$$

where,

E = PE emissions, in pounds, from each flake/powder solid processed;

U = the amount, in pounds, of each flake/powder solid processed (C.2.b)

0.005 = an emission rate of 0.5% pound PE per pound of flake/powder solid processed

- d. The total PE emission rate from all flake/powder solids processed (summation of C.2.c for all flake/powder solids processed), in pounds or tons;
  - e. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total PE emissions, in tons;
  - f. beginning the first month, after the first 12 months of operation following under the provisions of this permit, the rolling, 12-month PE emission rates, in tons.
  - g. during the first 12 calendar months of operation under the provisions of this permit, the cumulative year-to-date amount of flake/powder solids processed, in pounds; and
  - h. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the amount of flake/powder solid processed in pounds.
4. The permittee shall collect and record the following information for each day for this emission unit:
- a. the company identification for each material processed;
  - b. the number of pounds of each material processed;
  - c. the organic compound content of each material processed, in pounds per pounds material processed;
  - d. the total organic compound emission rate for all material processed, in pounds per day (summation of (b) x (c) for all materials processed);

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- e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all material processed, i.e., (d)/(e), in pounds per hour (average).
5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
  - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and

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combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

- e. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined
- f. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month restriction on the amount of flake/powder solid processed of 9,980 pounds.
- g. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative flake/powder solid processing rates specified in section B.2.
- h. An identification of each day during which the average hourly organic compound emissions from the products produced in this emission unit exceeded 8 pounds per hour, and the actual average hourly organic compound emission for each such day; and
- i. An identification of each day during which the organic compound emissions from the products produced in this emission unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

- 2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

**E. Testing Requirements**

- 1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emissions Unit ID: P020

- a. Emission Limitation: 1.69 lbs PE/hr

Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a maximum process weight rate of 1467 lbs/hr, a 46% solids content, an assumption that 50% of the solids are flake or powder and that 0.5% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation: No visible emissions

Applicable Compliance Method: If required, compliance with the particulate emission limitation shall be determined in accordance with Method 22 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- d. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- e. Emission Limitation: 29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined

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Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

- f. Emission Limitations: OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.

- g. Emission Limitation: The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

**F. Miscellaneous Requirements**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P021) - 1707 gallon mixer, 167 gallon pre-mix tank and container filling equipment (mixer no. 8 and pre-mix tank) Modification of PTI #03-9708, issued on May 13, 2004, to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	9.00 lbs particulate emissions (PE)/hr  No visible emissions  See A.2.a.
OAC rule 3745-31-05(C)	49.90 tons of organic compounds (OC) per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.b.i and B.1)  Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.ii)  29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined (See A.2.b.iii and B.2)
OAC rule 3745-17-07(A)	See A.2.c.
OAC rule 3745-17-11(B)	See A.2.d.
OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

**Ashland Specialty Chemicals**  
DTI Application: 03 17055

**Facility ID: 0303010043**

**Emissions Unit ID: P021**

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
  - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80

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1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- iii. 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined (See B.2).

- 2.c** This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.
- 2.e** The hourly emission limitation of 9.00 lbs PE/hr represents the potential to emit for this emission unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

**B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$\sum_{i=1}^{12} \sum_{j=1}^n [C_i U_j] \div 2000 \text{ lbs/ton} \leq 49.90$$

M=1 i=1

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001,

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P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

$C_i$  = OC emission factor, in lbs OC per lb of material i processed;

$U_i$  = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

Month	$\sum_{i=1}^n [C_i U_i] \div 2000$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

- The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Amount of Flake/Powder Processed (tons)</u>
1	2,000
1-2	4,000
1-3	6,000
1-4	8,000
1-12	9,980

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of flake/powder solids processed restriction shall be based upon a rolling, 12-month summation.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.
2. The permittee shall collect and record the following HAP information each month for

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emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:

- a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs, combined, from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
3. The permittee shall collect and record the following information each month for flake/powder solids processed in emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined:
- a. The name and identification number of each flake/powder solid processed;
  - b. The amount of each flake/powder solid processed, in pounds;
  - c. the PE emission rate, in pounds, for each flake/powder solid processed calculated using the following equation:

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$$E = U \times 0.005$$

where,

E = PE emissions, in pounds, from each flake/powder solid processed;

U = the amount, in pounds, of each flake/powder solid processed (C.2.b)

0.005 = an emission rate of 0.5% pound PE per pound of flake/powder solid processed

- d. The total PE emission rate from all flake/powder solids processed (summation of C.2.c for all flake/powder solids processed), in pounds or tons;
  - e. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total PE emissions, in tons;
  - f. beginning the first month, after the first 12 months of operation following under the provisions of this permit, the rolling, 12-month PE emission rates, in tons.
  - g. during the first 12 calendar months of operation under the provisions of this permit, the cumulative year-to-date amount of flake/powder solids processed, in pounds; and
  - h. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the amount of flake/powder solid processed in pounds.
4. The permittee shall collect and record the following information for each day for this emission unit:
- a. the company identification for each material processed;
  - b. the number of pounds of each material processed;
  - c. the organic compound content of each material processed, in pounds per pounds material processed;
  - d. the total organic compound emission rate for all material processed, in pounds per day (summation of (b) x (c) for all materials processed);

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- e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all material processed, i.e., (d)/(e), in pounds per hour (average).
5. The permit to install for this emissions unit P021 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene (F-2)

TLV (mg/m<sup>3</sup>): 191,610

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 3827MAGLC (mg/m<sup>3</sup>): 4562

Pollutant: toluene (PV-8)

TLV (mg/m<sup>3</sup>): 191,610

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 3768MAGLC (mg/m<sup>3</sup>): 4562

Pollutant: toluene (F-3)

TLV (mg/m<sup>3</sup>): 191,610

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 1527MAGLC (mg/m<sup>3</sup>): 4562

Pollutant: methyl ethyl ketone (F-2)

TLV (mg/m<sup>3</sup>): 599,809

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 3827MAGLC (mg/m<sup>3</sup>): 14,281

Pollutant: methyl ethyl ketone (PV-8)

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TLV (mg/m<sup>3</sup>): 599,809  
Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 3768  
MAGLC (mg/m<sup>3</sup>): 14,281

Pollutant: methyl ethyl ketone (F-3)  
TLV (mg/m<sup>3</sup>): 599,809  
Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 1527  
MAGLC (mg/m<sup>3</sup>): 14,281

Pollutant: hexane (F-2)  
TLV (mg/m<sup>3</sup>): 179,235  
Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 3827  
MAGLC (mg/m<sup>3</sup>): 4268

Pollutant: hexane (PV-8)  
TLV (mg/m<sup>3</sup>): 179,235  
Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 3768  
MAGLC (mg/m<sup>3</sup>): 4268

Pollutant: hexane (F-3)  
TLV (mg/m<sup>3</sup>): 179,235  
Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 1527  
MAGLC (mg/m<sup>3</sup>): 4268

6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the

Emissions Unit ID: **P021**

most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- 7. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- 8. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
  - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - e. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined

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- f. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month restriction on the amount of flake/powder solid processed of 9,980 pounds.
- g. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative flake/powder solid processing rates specified in section B.2.
- h. An identification of each day during which the average hourly organic compound emissions from the products produced in this emission unit exceeded 8 pounds per hour, and the actual average hourly organic compound emission for each such day; and
- i. An identification of each day during which the organic compound emissions from the products produced in this emission unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 9.00 lbs PE/hr

Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a maximum process weight rate of 7500 lbs/hr, a 60% solids content, an assumption that 40% of the solids are flake or powder

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and that 0.5% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation: No visible emissions

Applicable Compliance Method: If required, compliance with the particulate emission limitation shall be determined in accordance with Method 22 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- d. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- e. Emission Limitation: 29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

- f. Emission Limitations: OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.

- g. Emission Limitation: The maximum rolling 12-month quantity of flake/powder

**Ashland Specialty Chemicals**

**DTI Application: 02 17055**

**Facility ID: 0303010043**

Emissions Unit ID: **P021**

solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

**F. Miscellaneous Requirements**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P022) - Tote and pail filling (container filling associated with mixers no. 7 and 8) Modification of PTI #03-9708, issued on May 13, 2004, to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	12.0 lbs organic compounds (OC)/hr  See A.2.a.
OAC rule 3745-31-05(C)	49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.b.i and B.1)  Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.ii)
OAC rule 3745-21-07(G)	None (see A.2.c).

**2. Additional Terms and Conditions**

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT)

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regulations:

- i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
- ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<b><u>Month(s)</u></b>	<b><u>Individual HAP</u></b>	<b><u>Combined HAPs</u></b>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.c** OAC rule 3745-21-01(G)(2) does not apply because the emission unit is not

Emissions Unit ID: **P022**

involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

- 2.d** The hourly emission limitation of 12.00 lbs OC/hr represents the potential to emit for this emission unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

## B. Operational Restrictions

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$\sum_{i=1}^n [C_i U_i] \div 2000 \text{ lbs/ton} \leq 49.90$$

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

C<sub>i</sub> = OC emission factor, in lbs OC per lb of material i processed;

U<sub>i</sub> = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

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<b>Month</b>	$\sum_{i=1}^n [\sum C_i + \sum U_i] \div 2000$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the

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provisions of this permit, the rolling, 12-month OC emission rates, in tons.

2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
3. The permit to install for this emissions unit P022 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-

Emissions Unit ID: **P022**

Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene (F-12)

TLV (mg/m<sup>3</sup>): 191,610

Maximum Hourly Emission Rate (lbs/hr): 12 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 664.6

MAGLC (mg/m<sup>3</sup>): 4562

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Pollutant: toluene (P-22)

TLV (mg/m3): 191,610

Maximum Hourly Emission Rate (lbs/hr): 3.52 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 1814

MAGLC (mg/m3): 4562

Pollutant: methyl ethyl ketone (F-12)

TLV (mg/m3): 599,809

Maximum Hourly Emission Rate (lbs/hr): 12 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 664.6

MAGLC (mg/m3): 14,281

Pollutant: methyl ethyl ketone (P-22)

TLV (mg/m3): 599,809

Maximum Hourly Emission Rate (lbs/hr): 3.52 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 1814

MAGLC (mg/m3): 14,281

Pollutant: hexane (F-12)

TLV (mg/m3): 179,235

Maximum Hourly Emission Rate (lbs/hr): 12 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 664.6

MAGLC (mg/m3): 4268

Pollutant: hexane (P-22)

TLV (mg/m3): 179,235

Maximum Hourly Emission Rate (lbs/hr): 3.52 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 1814

MAGLC (mg/m3): 4268

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission

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of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- 5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

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

Emissions Unit ID: P022

- a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined.
- b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
- c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and, combined, HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
- d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

## E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 12.0 lbs OC/hr

Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a maximum process weight rate of 5427

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pounds per hour and a maximum OC content of 2.211 pounds per 1000 pounds.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-4 and 18, 25 or 25A, as applicable, of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- c. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

**F. Miscellaneous Requirements**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P023) - Container filling (drums and 5 gallon buckets) Modification of PTI #03-9708, issued on May 13, 2004, to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	14.0 lbs organic compounds (OC)/hr  See A.2.a.
OAC rule 3745-31-05(C)	49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.b.i and B.1)  Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.ii)
OAC rule 3745-21-07(G)	None (see A.2.c).

**2. Additional Terms and Conditions**

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration

Emissions Unit ID: P023

(PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:

- i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
- ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.c** OAC rule 3745-21-01(G)(2) does not apply because the emission unit is not

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involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

- 2.d** The hourly emission limitation of 14.00 lbs OC/hr represents the potential to emit for this emission unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

**B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$\sum_{i=1}^n C_i U_i \div 2000 \text{ lbs/ton} \leq 49.90$$

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

C<sub>i</sub> = OC emission factor, in lbs OC per lb of material i processed;

U<sub>i</sub> = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

<b>Month</b>	$\sum_{i=1}^n [\sum C_i \sum U_i] \div 2000$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the

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provisions of this permit, the rolling, 12-month OC emission rates, in tons.

2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs, combined, from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs, combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
3. The permit to install for this emissions unit P023 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-

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Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene (F-3)

TLV (mg/m<sup>3</sup>): 191,610

Maximum Hourly Emission Rate (lbs/hr): 14 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 1527

MAGLC (mg/m<sup>3</sup>): 4562

Emissions Unit ID: P023

Pollutant: methyl ethyl ketone (F-3)

TLV (mg/m3): 599,809

Maximum Hourly Emission Rate (lbs/hr): 14 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 1527

MAGLC (mg/m3): 14,281

Pollutant: hexane (F-12)

TLV (mg/m3): 179,235

Maximum Hourly Emission Rate (lbs/hr): 14 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 1527

MAGLC (mg/m3): 4268

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant

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emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
  - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

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- d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

## **E. Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

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- a. Emission Limitation: 14.0 lbs OC/hr

Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a maximum process weight rate of 5181 pounds per hour and a maximum OC content of 2.702 pounds per 1000 pounds.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-4 and 18, 25 or 25A, as applicable of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- c. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

**F. Miscellaneous Requirements**

None

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P024) - 2426 gallon mixer and container filling equipment (mixer no. 9) Modification of PTI #03-9859, issued on February 12, 1997, to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	7.3 tons organic compounds (OC)/yr  2.81 lbs particulate emissions (PE)/hr  See A.2.a.
OAC rule 3745-31-05(C)	49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.b.i and B.1)  Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.ii)  29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined (See A.2.b.iii and B.2)
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-17-11(B)	See A.2.c.
OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

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**Ashland Specialty Chemicals**  
DTI Application: 03 17055

**Facility ID: 0303010043**

**Emissions Unit ID: P024**

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-17-07(A), and OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
  - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<b><u>Month(s)</u></b>	<b><u>Individual HAP</u></b>	<b><u>Combined HAPs</u></b>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72

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1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- iii. 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined (See B.2).

**2.c** The requirements established pursuant to this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).

**2.d** The hourly emission limitation of 28.13 lbs PE/hr represents the potential to emit for this emission unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

**B. Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$\sum_{i=1}^{12} n [C_i U_i] \div 2000 \text{ lbs/ton} \leq 49.90$$

M=1

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

C<sub>i</sub> = OC emission factor, in lbs OC per lb of material i processed;

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$U_i =$  pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

<b>Month</b>	$\sum_{i=1}^n [\sum C_i U_i] \div 2000$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

- The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Amount of Flake/Powder Processed (tons)</u>
1	2,000

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1-2	4,000
1-3	6,000
1-4	8,000
1-12	9,980

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of flake/powder solids processed restriction shall be based upon a rolling, 12-month summation.

### C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;

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- b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
3. The permittee shall collect and record the following information each month for flake/powder solids processed in emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined:
- a. The name and identification number of each flake/powder solid processed;
  - b. The amount of each flake/powder solid processed, in pounds;
  - c. the PE emission rate, in pounds, for each flake/powder solid processed calculated using the following equation:

$$E = U \times 0.005$$

where,

E = PE emissions, in pounds, from each flake/powder solid processed;

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U = the amount, in pounds, of each flake/powder solid processed (C.2.b)

0.005 = an emission rate of 0.5% pound PE per pound of flake/powder solid processed

- d. The total PE emission rate from all flake/powder solids processed (summation of C.2.c for all flake/powder solids processed), in pounds or tons;
  - e. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total PE emissions, in tons;
  - f. beginning the first month, after the first 12 months of operation following under the provisions of this permit, the rolling, 12-month PE emission rates, in tons.
  - g. during the first 12 calendar months of operation under the provisions of this permit, the cumulative year-to-date amount of flake/powder solids processed, in pounds; and
  - h. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the amount of flake/powder solid processed in pounds.
4. The permittee shall collect and record the following information for each day for this emission unit:
- a. the company identification for each material processed;
  - b. the number of pounds of each material processed;
  - c. the organic compound content of each material processed, in pounds per pounds material processed;
  - d. the total organic compound emission rate for all material processed, in pounds per day (summation of (b) x (c) for all materials processed);
  - e. the total number of hours the emissions unit was in operation;
  - f. the average hourly organic compound emission rate for all material processed, i.e., (d)/(e), in pounds per hour (average); and



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of this permit, all exceedances of the 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined

- f. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month restriction on the amount of flake/powder solid processed of 9,980 pounds.
- g. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative flake/powder solid processing rates specified in section B.2.
- h. An identification of each day during which the average hourly organic compound emissions from the products produced in this emission unit exceeded 8 pounds per hour, and the actual average hourly organic compound emission for each such day; and
- i. An identification of each day during which the organic compound emissions from the products produced in this emission unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

- 2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**Testing Requirements**

- 1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 7.3 tons OC/yr
  - Applicable Compliance Method: Compliance shall be based upon the record keeping

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requirements in section C.4.

- b. Emission Limitation: 2.81 lbs PE/hr

Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a maximum process weight rate of 11,250 lbs/hr, a 50% solids content, an assumption that 100% of the solids are flake or powder and that 0.05% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- d. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- e. Emission Limitation: 29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

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

Applicable Compliance Method: If required, compliance with the visible emissions limitation

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above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- g. Emission Limitations: OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.

- h. Emission Limitation: The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

**Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P026) - 523 gallon mixer and container filling equipment (mixer no. 5) Modification of an existing emission unit to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
45-31-05(C)	49.90 tons of organic compounds (OC) per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.a.i and B.1)  Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 combined shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.a.ii)  29.90 tons of particulate emissions (PE) per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined (See A.2.a.iii and B.2)
45-17-07(A)	See A.2.b
45-17-11(B)	See A.2.c
45-21-07(G)	None (See A.2.d)

**2. Additional Terms and Conditions**

2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:

- i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024,

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P026, P027 and P028, combined, (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.

- ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<b><u>Month(s)</u></b>	<b><u>Individual HAP</u></b>	<b><u>Combined HAPs</u></b>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- iii. 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined (See B.2).

- 2.b** This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

Emissions Unit ID: P026

- 2.c** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.
- 2.d** OAC rule 3745-21-01(G)(2) does not apply because the emission unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

### Operational Restrictions

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$M \sum_{i=1}^n [C_i U_i] \div 2000 \text{ lbs/ton} \leq 49.90$$

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

C<sub>i</sub> = OC emission factor, in lbs OC per lb of material i processed;

U<sub>i</sub> = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

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Month	$\frac{\sum_{i=1}^n [\sum C_i + \sum U_i]}{2000}$ is less than or equal to
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

2. The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Amount of Flake/Powder Processed (tons)</u>
1	2,000
1-2	4,000
1-3	6,000
1-4	8,000
1-12	9,980

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of flake/powder solids processed restriction shall be based upon a rolling, 12-month summation.

**Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each month for materials processed

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in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:

- a. The name and identification number of each material processed (as defined in B.1);
- b. The amount of each material processed, in pounds;
- c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
- d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
- e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
- f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
- g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.

2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:

- a. the company identification of each material processed or stored;
- b. identification of each individual HAP contained in each material processed or stored;
- c. the number of pounds of each material processed or stored;
- d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
- e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
- f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;

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- g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
- h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

3. The permittee shall collect and record the following information each month for flake/powder solids processed in emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined:

- a. The name and identification number of each flake/powder solid processed;
- b. The amount of each flake/powder solid processed, in pounds;
- c. the PE emission rate, in pounds, for each flake/powder solid processed calculated using the following equation:

$$E = U \times 0.005$$

where,

E = PE emissions, in pounds, from each flake/powder solid processed;

U = the amount, in pounds, of each flake/powder solid processed (C.2.b)

0.005 = an emission rate of 0.5% pound PE per pound of flake/powder solid processed

- d. The total PE emission rate from all flake/powder solids processed (summation of C.2.c for all flake/powder solids processed), in pounds or tons;
- e. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total PE emissions, in tons;
- f. beginning the first month, after the first 12 months of operation following under the provisions of this permit, the rolling, 12-month PE emission rates, in tons.
- g. during the first 12 calendar months of operation under the provisions of this permit, the cumulative year-to-date amount of flake/powder solids processed, in pounds; and
- h. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the amount of flake/powder solid processed

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in pounds.

## Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
  - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.a.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.a.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - e. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined
  - f. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month restriction on the amount of flake/powder solid processed of 9,980 pounds.
  - g. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative flake/powder solid processing rates specified in section B.2.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of

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this permit.

## Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- c. Emission Limitation: 29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

## Miscellaneous Requirements

None

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## II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment - (P027) - 1210 gallon mixer, 318 gallon pre-mix tank and container filling equipment (mixer no. 7 and pre-mix tank) Modification of an existing emission unit to establish synthetic minor limitations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
45-31-05(C)	<p>49.90 tons of organic compounds (OC) per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.a.i and B.1)</p> <p>Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.a.ii)</p> <p>29.90 tons of particulate emissions (PE) per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined (See A.2.b.iii and B.2)</p>
45-17-07(A)	See A.2.b
45-17-11(B)	See A.2.c.
45-21-07(G)	None (See A.2.b)

### 2. Additional Terms and Conditions

- 2.a This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:

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- i. 49.90 tons of VOC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined, (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
- ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- iii. 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined (See B.2).

**2.b** This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not

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applicable.

- 2.c** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.
- 2.d** OAC rule 3745-21-01(G)(2) does not apply because the emission unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

### Operational Restrictions

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$\sum_{i=1}^{12} \sum_{n} [C_i U_i] \div 2000 \text{ lbs/ton} \leq 49.90$$

M=1 i=1

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

C<sub>i</sub> = OC emission factor, in lbs OC per lb of material i processed;

U<sub>i</sub> = pounds of material i processed;

Material i, is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material i, non-container filling of solvent borne material would be defined as another material i, etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

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<b>Month</b>	$\frac{\sum_{i=1}^n [\sum C_i + \sum U_i]}{2000}$ <p>is less than or equal to</p>
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

2. The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Amount of Flake/Powder Processed (tons)</u>
1	2,000
1-2	4,000
1-3	6,000
1-4	8,000
1-12	9,980

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of flake/powder solids processed restriction shall be based upon a rolling, 12-month summation.

### Monitoring and/or Record keeping Requirements

Emissions Unit ID: P027

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed ( $C.1.b \times C.1.c$ );
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.
  
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;

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- g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
- h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

3. The permittee shall collect and record the following information each month for flake/powder solids processed in emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined:

- a. The name and identification number of each flake/powder solid processed;
- b. The amount of each flake/powder solid processed, in pounds;
- c. the PE emission rate, in pounds, for each flake/powder solid processed calculated using the following equation:

$$E = U \times 0.005$$

where,

E = PE emissions, in pounds, from each flake/powder solid processed;

U = the amount, in pounds, of each flake/powder solid processed (C.2.b)

0.005 = an emission rate of 0.5% pound PE per pound of flake/powder solid processed

- d. The total PE emission rate from all flake/powder solids processed (summation of C.2.c for all flake/powder solids processed), in pounds or tons;
- e. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total PE emissions, in tons;
- f. beginning the first month, after the first 12 months of operation following under the provisions of this permit, the rolling, 12-month PE emission rates, in tons.
- g. during the first 12 calendar months of operation under the provisions of this permit, the cumulative year-to-date amount of flake/powder solids processed, in pounds; and
- h. beginning the first month after the first 12 calendar months of operation following the issuance

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of this permit, the rolling, 12-month summation of the amount of flake/powder solid processed in pounds.

## Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
  - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - e. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined
  - f. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month restriction on the amount of flake/powder solid processed of 9,980 pounds.
  - g. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative flake/powder solid processing rates specified in section B.2.

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These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

**Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.
  - b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.
  - c. Emission Limitation: 29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

**Miscellaneous Requirements**

None

## II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### Applicable Emissions Limitations and/or Control Requirements

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

#### Operations, Property, and/or Equipment - (P028) - 650 gallon mixer and container filling equipment (mixer no. 20 - change can mixer)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
45-31-05(A)(3)	7.3 tons organic compounds (OC)/yr  7.75 lbs particulate emissions (PE)/hr  Visible PE shall not exceed 20% opacity, as a 6-minute average.  See A.2.a.
45-31-05(C)	49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined (See A.2.b.i and B.1)  Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.ii)  29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined (See A.2.b.iii and B.2)
45-17-07(A)	See A.2.c.
45-17-11(B)	See A.2.d.
45-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

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- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, (See B.1). For purposes of federal enforceability, a limitation on OC effectively limits VOC.
  - ii. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<b><u>Month(s)</u></b>	<b><u>Individual HAP</u></b>	<b><u>combined HAPs</u></b>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

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After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- iii. 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined (See B.2).

**2.c** This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

**2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Ashland County.

**2.e** The hourly emission limitation of 7.75 lbs PE/hr represents the potential to emit for this emission unit. Therefore, no monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

**Operational Restrictions**

1. The maximum rolling, 12-month quantity of materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, is limited by the following equation:

$$M \sum_{i=1}^n [C_i U_i] \div 2000 \text{ lbs/ton} \leq 49.90$$

where,

M = the increment of the rolling 12-month period;

n = total number of unique materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028

C<sub>i</sub> = OC emission factor, in lbs OC per lb of material i processed;

$U_i =$  pounds of material  $i$  processed;

Material  $i$ , is defined as a unique material that is processed by a given operation (i.e. container filling of structural/reactive material would be defined as a single material  $i$ , non-container filling of solvent borne material would be defined as another material  $i$ , etc)

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined, shall not exceed the following rates:

<b>Month</b>	$\sum_{i=1}^n [C_i U_i] \div 2000$ <p>is less than or equal to</p>
1	10
1-2	20
1-3	30
1-4	40
1-12	49.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of material processed restriction shall be based upon a rolling, 12-month summation.

- The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Amount of Flake/Powder Processed (tons)</u>
1	2,000
1-2	4,000
1-3	6,000
1-4	8,000

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1-12	9,980
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After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual amount of flake/powder solids processed restriction shall be based upon a rolling, 12-month summation.

**Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each month for materials processed in emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined:
  - a. The name and identification number of each material processed (as defined in B.1);
  - b. The amount of each material processed, in pounds;
  - c. The OC emission factor for each material processed, in pounds of OC per pound of material processed;
  - d. the OC emission rate, in pounds, for each material processed (C.1.b x C.1.c);
  - e. The total OC emission rate from all materials processed (summation of C.1.d for all materials processed), in pounds or tons;
  - f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total OC emissions, in tons;
  - g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month OC emission rates, in tons.
  
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;

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- d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
- e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
- f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
- g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
- h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

3. The permittee shall collect and record the following information each month for flake/powder solids processed in emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined:

- a. The name and identification number of each flake/powder solid processed;
- b. The amount of each flake/powder solid processed, in pounds;
- c. the PE emission rate, in pounds, for each flake/powder solid processed calculated using the following equation:

$$E = U \times 0.005$$

where,

E = PE emissions, in pounds, from each flake/powder solid processed;

U = the amount, in pounds, of each flake/powder solid processed (C.2.b)

0.005 = an emission rate of 0.5% pound PE per pound of flake/powder solid processed

- d. The total PE emission rate from all flake/powder solids processed (summation of C.2.c for all flake/powder solids processed), in pounds or tons;
- e. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total PE emissions, in tons;

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- f. beginning the first month, after the first 12 months of operation following under the provisions of this permit, the rolling, 12-month PE emission rates, in tons.
- g. during the first 12 calendar months of operation under the provisions of this permit, the cumulative year-to-date amount of flake/powder solids processed, in pounds; and
- h. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the amount of flake/powder solid processed in pounds.

- 4. The permittee shall collect and record the following information for each day for this emission unit:
  - a. the company identification for each material processed;
  - b. the number of pounds of each material processed;
  - c. the organic compound content of each material processed, in pounds per pounds material processed;
  - d. the total organic compound emission rate for all material processed, in pounds per day (summation of (b) x (c) for all materials processed);
  - e. the total number of hours the emissions unit was in operation;
  - f. the average hourly organic compound emission rate for all material processed, i.e., (d)/(e), in pounds per hour (average); and
  - g. the annual year to date OC emissions for all materials processed (summation of (d) for each day to date from January to December).
- 5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and

- c. any corrective actions taken to eliminate the visible emissions.

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**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 49.90 tons of OC per rolling, 12-month period for emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, and P028, combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative material processing rates specified in section B.1.
  - c. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - d. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.ii from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - e. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the 29.90 tons of PE per rolling, 12-month period for emissions units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined
  - f. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling, 12-month restriction on the amount of flake/powder solid processed of 9,980 pounds.
  - g. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative flake/powder solid processing rates specified in section B.2.

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- h. An identification of each day during which the average hourly organic compound emissions from the products produced in this emission unit exceeded 8 pounds per hour, and the actual average hourly organic compound emission for each such day; and
- i. An identification of each day during which the organic compound emissions from the products produced in this emission unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

- 2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 3. The permittee shall submit annual reports that summarize the total annual actual OC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

- 1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 7.3 tons OC/yr  
  
Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.4.
  - b. Emission Limitation: 7.75 lbs PE/hr  
  
Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

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\*The potential to emit is based on a maximum process weight rate of 3100 lbs/hr, a 50% solids content, an assumption that 100% of the solids are flake or powder and that 0.5% of the flake or powder is emitted.

If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method: If required, compliance with the particulate emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- d. Emission Limitation: 49.90 tons of OC per rolling, 12-month period from emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.1.

- e. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- f. Emission Limitation: 29.90 tons of PE per rolling, 12-month period from emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027 and P028, combined

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

- g. Emission Limitations: OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

Applicable Compliance Method: Compliance shall be based upon the record

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keeping requirements in section C.4.

- h. Emission Limitation: The maximum rolling 12-month quantity of flake/powder solids processed in emission units P005, P006, P007, P008, P018, P019, P020, P021, P024, P026, P027, and P028, combined, shall not exceed 9980 tons

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

**F. Miscellaneous Requirements**

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (P029) - Facility wide cleanup operations**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)	511.67 lbs organic compounds (OC)/month, 3.07 tons OC/yr  See A.2.a.
OAC rule 3745-31-05(C)	Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.i)
OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs OC/hr and 40 lbs/day

**2. Additional Terms and Conditions**

- 2.a The permittee has requested voluntary allowable emission limitations of 511.67 lbs OC/month and 3.07 tons OC/yr. The short-term (lbs/month) and long-term (tons/yr) emission limitations for OC are being established as practically and legally enforceable requirements representing the potential to emit.
- 2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
  - i. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023,

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P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

**B. Operational Restrictions**

None

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following each month for cleanup operations at the facility:
  - a. the name and identification of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds per gallon;

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- c. the number of gallons of each cleanup material employed;
  - d. the OC emissions from each cleanup material employed (C.2.b x C.2.c);
  - e. the total OC emissions from all the cleanup materials employed (summation of C.2.d for all cleanup materials) in pounds or tons; and
  - f. the annual year to date OC emissions from the cleanup operations, in tons per year (summation of C.1.e for each calendar month to date from January to December).
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
- a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs, combined, from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs, combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

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3. The permittee shall collect and record the following information for each day for this emission unit:
  - a. the company identification for each cleanup material employed;
  - b. the number of pounds of each cleanup material employed;
  - c. the organic compound content of each cleanup material, in pounds per pounds employed;
  - d. the total organic compound emission rate for all cleanup materials employed, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all cleanup materials employed i.e., (d)/(e), in pounds per hour (average).

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
  - a. all exceedances of the monthly OC emission limitation of 511.67 pounds .
  - b. all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014.
  - c. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014.
  - d. an identification of each day during which the average hourly organic compound emissions from the products produced in this emission unit exceeded 8 pounds

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per hour, and the actual average hourly organic compound emission for each such day; and

- e. an identification of each day during which the organic compound emissions from the products produced in this emission unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit annual reports that summarize the total annual actual OC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

## E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 511.67 lbs OC/month and 3.07 tons OC/yr

Applicable Compliance Method: Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in section C.1 of this permit.

- b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

- c. Emission Limitation: OC emissions shall not exceed 8 lbs/hr and 40 lbs/day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.3.

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**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (T004) - 11,000 gallon vertical fixed roof storage tank (tank 105)**

Modification of an existing emission unit to establish OC limitations and synthetic minor limitations for HAPs

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
45-31-02(A)	1.02 tons of organic compounds (OC)/yr  See A.2.a.
45-31-05(C)	Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.i)
45-21-07(D)	See A.2.c.

**2. Additional Terms and Conditions**

- 2.a The permittee has requested voluntary an allowable emission limitation for OC of 1.02 tons/yr. The long-term emission limitation for OC is being established as a practically and legally enforceable requirement representing the potential to emit based on the maximum annual throughput for this emission unit (see B.1).
- 2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
  - i. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028,

Emissions Unit ID: T004

P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.c** This emissions unit is not subject to OAC rule 3745-21-07 because, pursuant to OAC rule 3745-21-07(A), this facility is located in Ashland County, which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source."

**Operational Restrictions**

1. The maximum annual throughput for this emissions unit shall not exceed 528,000 gallons.

**Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the amount of material throughput, in gallons; and

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- b. the OC emissions, in pounds, calculated by using Tanks 4.0 program and the actual amount of material throughput, from section C.1.a. above.

2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:

- a. the company identification of each material processed or stored;
- b. identification of each individual HAP contained in each material processed or stored;
- c. the number of pounds of each material processed or stored;
- d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
- e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
- f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
- g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
- h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

**Reporting Requirements**

- 1. The permittee shall submit annual reports that summarize the actual annual material throughput for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- 2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission

Emissions Unit ID: T004

limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

- b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and, combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

### Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 1.02 tons OC/yr

Applicable Compliance Method: The permittee shall demonstrate compliance with the annual limitation above based on the record keeping requirements in section C.1 of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.

- b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

### Miscellaneous Requirements

None

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## II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment - (T005) - 11,000 gallon vertical fixed roof storage tank (tank 102)**  
Modification of an existing emission unit to establish OC limitations and synthetic minor limitations for HAPs

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
45-31-02(A)	0.44 ton of organic compounds (OC)/yr  See A.2.a.
45-31-05(C)	Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.i)
45-21-07(D)	See A.2.c.

### 2. Additional Terms and Conditions

- 2.a** The permittee has requested voluntary an allowable emission limitation for OC of 0.44 tons/yr. The long-term emission limitation for OC is being established as a practically and legally enforceable requirement representing the potential to emit based on the maximum annual throughput for this emission unit (see B.1).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028,

Emissions Unit ID: T005

P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.c** This emissions unit is not subject to OAC rule 3745-21-07 because, pursuant to OAC rule 3745-21-07(A), this facility is located in Ashland County, which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source."

**Operational Restrictions**

1. The maximum annual throughput for this emissions unit shall not exceed 528,000 gallons.

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**Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the amount of material throughput, in gallons; and
  - b. the OC emissions, in pounds, calculated by using Tanks 4.0 program and the actual amount of material throughput, from section C.1.a. above.
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

**Reporting Requirements**

1. The permittee shall submit annual reports that summarize the actual annual material throughput for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

Emissions Unit ID: T005

2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
- Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and, combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

## Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
- Emission Limitation: 0.44 ton OC/yr  
  
Applicable Compliance Method: The permittee shall demonstrate compliance with the annual limitation above based on the record keeping requirements in section C.1 of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.
  - Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

## Miscellaneous Requirements

None

**Issued: To be entered upon final issuance**

Emissions Unit ID: **T005**

Issued: To be entered upon final issuance

## II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment - (T006) - 11,000 gallon vertical fixed roof storage tank (tank 109)**  
Modification of an existing emission unit to establish OC limitations and synthetic minor limitations for HAPs

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
45-31-02(A)	0.085 ton of organic compounds (OC)/yr  See A.2.a.
45-31-05(C)	Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014 , combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.i)
45-21-07(D)	See A.2.c.

### 2. Additional Terms and Conditions

- 2.a** The permittee has requested voluntary an allowable emission limitation for OC of 0.085 tons/yr. The long-term emission limitation for OC is being established as a practically and legally enforceable requirement representing the potential to emit based on the maximum annual throughput for this emission unit (see B.1).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028,

Emissions Unit ID: T006

P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.c** This emissions unit is not subject to OAC rule 3745-21-07 because, pursuant to OAC rule 3745-21-07(A), this facility is located in Ashland County, which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source."

### Operational Restrictions

1. The maximum annual throughput for this emissions unit shall not exceed 528,000 gallons.

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**Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the amount of material throughput, in gallons; and
  - b. the OC emissions, in pounds, calculated by using Tanks 4.0 program and the actual amount of material throughput, from section C.1.a. above.
  
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

**Reporting Requirements**

1. The permittee shall submit annual reports that summarize the actual annual material throughput for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**Issued: To be entered upon final issuance**

2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:

- a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
- b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

**Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.085 tons OC/yr

Applicable Compliance Method: The permittee shall demonstrate compliance with the annual limitation above based on the record keeping requirements in section C.1 of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.

- b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

**Miscellaneous Requirements**

None

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**Ashland Specialty Chemicals**  
DTI Application: 03 17055

**Facility ID: 0303010043**

**Emissions Unit ID: T006**

Issued: To be entered upon final issuance

## II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment - (T007) - 11,000 gallon vertical fixed roof storage tank (tank 101)**  
Modification of an existing emission unit to establish OC limitations and synthetic minor limitations for HAPs

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
45-31-02(A)	0.95 tons of organic compounds (OC)/yr  See A.2.a.
45-31-05(C)	Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.i)
45-21-07(D)	See A.2.c.

### 2. Additional Terms and Conditions

- 2.a** The permittee has requested voluntary an allowable emission limitation for OC of 0.95 tons/yr. The long-term emission limitation for OC is being established as a practically and legally enforceable requirement representing the potential to emit based on the maximum annual throughput for this emission unit (see B.1).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined,

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shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.c** This emissions unit is not subject to OAC rule 3745-21-07 because, pursuant to OAC rule 3745-21-07(A), this facility is located in Ashland County, which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source."

**Operational Restrictions**

1. The maximum annual throughput for this emissions unit shall not exceed 528,000 gallons.

**Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the amount of material throughput, in gallons; and
  - b. the OC emissions, in pounds, calculated by using Tanks 4.0 program and the actual amount of material throughput, from section C.1.a. above.
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

**Reporting Requirements**

1. The permittee shall submit annual reports that summarize the actual annual material throughput for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the

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following:

- a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
- b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

**Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.95 tons OC/yr

Applicable Compliance Method: The permittee shall demonstrate compliance with the annual limitation above based on the record keeping requirements in section C.1 of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.

- b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

**Miscellaneous Requirements**

None

**II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (T008) - 11,000 gallon vertical fixed roof storage tank (tank 104)**  
 Modification of an existing emission unit to establish OC limitations and synthetic minor limitations for HAPs

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
45-31-02(A)	0.048 ton of organic compounds (OC)/yr  See A.2.a.
45-31-05(C)	Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs(See A.2.b.i)
45-21-07(D)	See A.2.c.

**2. Additional Terms and Conditions**

**2.a** The permittee has requested voluntary an allowable emission limitation for OC of 0.048 tons/yr. The long-term emission limitation for OC is being established as a practically and legally enforceable requirement representing the potential to emit based on the maximum annual throughput for this emission unit (see B.1).

**2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:

- i. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90

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tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<b><u>Month(s)</u></b>	<b><u>Individual HAP</u></b>	<b><u>Combined HAPs</u></b>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.c** This emissions unit is not subject to OAC rule 3745-21-07 because, pursuant to OAC rule 3745-21-07(A), this facility is located in Ashland County, which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new stationary source."

**Operational Restrictions**

1. The maximum annual throughput for this emissions unit shall not exceed 528,000 gallons.

**Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the amount of material throughput, in gallons; and
  - b. the OC emissions, in pounds, calculated by using Tanks 4.0 program and the actual amount of material throughput, from section C.1.a. above.
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

**Reporting Requirements**

1. The permittee shall submit annual reports that summarize the actual annual material throughput for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the

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following:

- a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
- b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

**Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.048 ton OC/yr

Applicable Compliance Method: The permittee shall demonstrate compliance with the annual limitation above based on the record keeping requirements in section C.1 of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.

- b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

**Miscellaneous Requirements**

None

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

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

**Conditions, Property, and/or Equipment - (T009) - 20,000 gallon vertical fixed roof storage tank (tank 103)**  
Modification of PTI #03-10248, issued on July 22, 1998, to establish synthetic minor limitations for HAPs

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
45-31-05(A)(3)	0.23 ton organic compounds (OC)/yr  See A.2.a.
45-31-05(C)	Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs(See A.2.b.i)
45-21-07(D)	See A.2.c.

**2. Additional Terms and Conditions**

**2.a** Best Available Technology (BAT) for this emissions unit has been determined to be the use of submerged fill and includes compliance with the requirements of OAC rule 3745-31-05(C).

**2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:

- i. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.c** The emission limitation specified by this rule is equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Operational Restrictions**

1. The maximum annual throughput for this emissions unit shall not exceed 960,000 gallons.

**Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records of the following information for this emissions unit:
- the amount of material throughput, in gallons; and
  - the OC emissions, in pounds, calculated by using Tanks 4.0 program and the actual amount of material throughput, from section C.1.a. above.

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2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:

- a. the company identification of each material processed or stored;
- b. identification of each individual HAP contained in each material processed or stored;
- c. the number of pounds of each material processed or stored;
- d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
- e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
- f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
- g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
- h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

## Reporting Requirements

1. The permittee shall submit annual reports that summarize the actual annual material throughput for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
  - b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and, combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

## Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: 0.23 ton OC/yr  
  
Applicable Compliance Method: The permittee shall demonstrate compliance with the annual limitation above based on the record keeping requirements in section C.1 of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.
  - b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping

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requirements in section C.2.

### **Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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## II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment - (T010) - 20,000 gallon vertical fixed roof storage tank (tank 110)**  
Modification of PTI #03-4160, issued on June 8, 1989, to establish synthetic minor limitations for HAPs

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
45-31-05(A)(3)	0.86 ton organic compounds (OC)/yr  See A.2.a.
45-31-05(C)	Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs(See A.2.b.i)
45-21-07(D)	See A.2.c.

### 2. Additional Terms and Conditions

- 2.a** Best Available Technology (BAT) for this emissions unit has been determined to be the use of submerged fill and includes compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
- i. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

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To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.c** The emission limitation specified by this rule is equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Operational Restrictions**

1. The maximum annual throughput for this emissions unit shall not exceed 960,000 gallons.

**Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the amount of material throughput, in gallons; and
  - b. the OC emissions, in pounds, calculated by using Tanks 4.0 program and the actual amount of material throughput, from section C.1.a. above.

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2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
  - a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

**Reporting Requirements**

1. The permittee shall submit annual reports that summarize the actual annual material throughput for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023,

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P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

- b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

### Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.86 ton OC/yr

Applicable Compliance Method: The permittee shall demonstrate compliance with the annual limitation above based on the record keeping requirements in section C.1 of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.

- b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

### Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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

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materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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## II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### Applicable Emissions Limitations and/or Control Requirements

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

### Operations, Property, and/or Equipment - (T012) - 11,300 gallon vertical fixed roof storage tank (tank 106)

Modification of PTI #03-5928, issued on November 20, 1991, to establish synthetic minor limitations for HAPs

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
45-31-05(A)(3)	0.48 ton organic compounds (OC)/yr  See A.2.a.
45-31-05(C)	Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.i)
45-21-07(D)	See A.2.c.

### 2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be the use of submerged fill and includes compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
  - i. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and

Emissions Unit ID: T012

T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.c** The emission limitation specified by this rule is equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Operational Restrictions**

1. The maximum annual throughput for this emissions unit shall not exceed 528,000 gallons.

**Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the amount of material throughput, in gallons; and

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- b. the OC emissions, in pounds, calculated by using Tanks 4.0 program and the actual amount of material throughput, from section C.1.a. above.
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
- a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

**Reporting Requirements**

1. The permittee shall submit annual reports that summarize the actual annual material throughput for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
  - a. Beginning the first month after the first 12 calendar months of operation under the

Emissions Unit ID: T012

provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

- b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

### Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.48 ton OC/yr

Applicable Compliance Method: The permittee shall demonstrate compliance with the annual limitation above based on the record keeping requirements in section C.1 of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.

- b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

### Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound

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will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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## II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment - (T013) - 11,300 gallon vertical fixed roof storage tank (tank 107)**  
Modification of PTI #03-5928, issued on November 20, 1991, to establish synthetic minor limitations for HAPs

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
45-31-05(A)(3)	0.48 ton organic compounds (OC)/yr  See A.2.a.
45-31-05(C)	Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs (See A.2.b.i)
45-21-07(D)	See A.2.c.

### 2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be the use of submerged fill and includes compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
  - i. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and

Emissions Unit ID: T013

T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.c** The emission limitation specified by this rule is equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Operational Restrictions**

1. The maximum annual throughput for this emissions unit shall not exceed 528,000 gallons.

**Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the amount of material throughput, in gallons; and

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- b. the OC emissions, in pounds, calculated by using Tanks 4.0 program and the actual amount of material throughput, from section C.1.a. above.
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
- a. the company identification of each material processed or stored;
  - b. identification of each individual HAP contained in each material processed or stored;
  - c. the number of pounds of each material processed or stored;
  - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
  - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
  - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
  - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
  - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

**Reporting Requirements**

1. The permittee shall submit annual reports that summarize the actual annual material throughput for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:

Emissions Unit ID: T013

- a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.
- b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

### Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.48 ton OC/yr

Applicable Compliance Method: The permittee shall demonstrate compliance with the annual limitation above based on the record keeping requirements in section C.1 of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.

- b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

### Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not

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necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Issued: To be entered upon final issuance

## II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment - (T014) - 11,300 gallon vertical fixed roof storage tank (tank 108)**  
Modification of PTI #03-5928, issued on November 20, 1991, to establish synthetic minor limitations for HAPs

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
45-31-05(A)(3)	0.48 ton organic compounds (OC)/yr  See A.2.a.
45-31-05(C)	Annual Hazardous Air Pollutants (HAP) emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs(See A.2.b.i)
45-21-07(D)	See A.2.c.

### 2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) for this emissions unit has been determined to be the use of submerged fill and includes compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD), Title V and Maximum Achievable Control Technology (MACT) regulations:
  - i. Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and

Emissions Unit ID: T014

T014, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs.

To ensure federal enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons):**

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.66	4.16
1-3	2.49	6.24
1-4	3.32	8.32
1-5	4.15	10.40
1-6	4.98	12.48
1-7	5.81	14.56
1-8	6.64	16.64
1-9	7.47	18.72
1-10	8.30	20.80
1-11	9.13	22.88
1-12	9.90	24.90

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

- 2.c** The emission limitation specified by this rule is equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Operational Restrictions**

1. The maximum annual throughput for this emissions unit shall not exceed 528,000 gallons.

**Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the amount of material throughput, in gallons; and

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- b. the OC emissions, in pounds, calculated by using Tanks 4.0 program and the actual amount of material throughput, from section C.1.a. above.
2. The permittee shall collect and record the following HAP information each month for emission units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined:
    - a. the company identification of each material processed or stored;
    - b. identification of each individual HAP contained in each material processed or stored;
    - c. the number of pounds of each material processed or stored;
    - d. the calculated emission rate for each individual HAP from each material processed or stored, in pounds;
    - e. the total emission rate for each individual HAP from all the materials processed or stored (for each individual HAP, the summation of C.2.d for all materials processed or stored), in pounds;
    - f. the total HAP emission rate for all HAPs combined from all materials processed or stored (summation of C.2.e for all HAPs for all materials processed or stored), in pounds;
    - g. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons; and
    - h. after the first 12 months of operation under the provisions of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

**Reporting Requirements**

1. The permittee shall submit annual reports that summarize the actual annual material throughput for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:

**Issued: To be entered upon final issuance**

- a. Beginning the first month after the first 12 calendar months of operation under the provisions of this permit, all exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined,.
- b. For the first 12 calendar months of operation under the provisions of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations specified in section A.2.b.i from emissions units P001, P005, P006, P007, P008, P014, P015, P015, P017, P018, P019, P020, P021, P022, P023, P024, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013, and T014, combined,.

These deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

**Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.48 ton OC/yr

Applicable Compliance Method: The permittee shall demonstrate compliance with the annual limitation above based on the record keeping requirements in section C.1 of this permit and shall be the summation of the 12 monthly OC emission rates for the calendar year.

- b. Emission Limitation: Annual HAP emissions from emissions units P001, P005, P006, P007, P008, P014, P015, P017, P018, P019, P020, P021, P022, P023, P24, P026, P027, P028, P029, T004, T005, T006, T007, T008, T009, T010, T012, T013 and T014, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section C.2.

**Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not

**Ashland Specialty Chemicals**

DTI Application: 03 17055

Facility ID: 0303010043

Emissions Unit ID: **T014**

necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.