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

Certified Mail

8/14/2012

Mr. Ted Erickson
Weidmann Electrical Techonology, Inc.
P.O. Box 706
Urbana, OH 43708

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0511005006
Permit Number: P0110113
Permit Type: Initial Installation
County: Champaign

Dear Permit Holder:

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

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

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

If you have any questions, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page,www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-SWDO

Response to Comments

Facility ID:	0511005006
Facility Name:	Weidmann Electrical Techonology, Inc.
Facility Description:	Manufacture electical grade and convert to transformer components
Facility Address:	700 West Court Street Same as Above Urbana, OH 43078 Champaign County
Permit:	P0110113, Permit-To-Install and Operate - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Urbana Daily Citizen on 07/06/2012. The comment period ended on 08/11/2012.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

   a. Comment: None

   b. Response: None

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Weidmann Electrical Techonology, Inc.

Facility ID:	0511005006
Permit Number:	P0110113
Permit Type:	Initial Installation
Issued:	8/14/2012
Effective:	8/14/2012
Expiration:	8/14/2017

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Weidmann Electrical Techonology, Inc.

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Authorization

Facility ID:	0511005006
Application Number(s):	A0044633
Permit Number:	P0110113
Permit Description:	Converts bales of pulp to paper by adding then removing water, rewind paper into individual rolls slitting with liquid polymer additives.
Permit Type:	Initial Installation
Permit Fee:	$200.00
Issue Date:	8/14/2012
Effective Date:	8/14/2012
Expiration Date:	8/14/2017

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Weidmann Electrical Techonology, Inc.
700 West Court Street
Same as Above
Urbana, OH 43078

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

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

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0110113
Permit Description: Converts bales of pulp to paper by adding then removing water, rewind paper into individual rolls slitting with liquid polymer additives.

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

Emissions Unit ID:	**R002**
Company Equipment ID:	Paper Machine
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) Sections B2., 3., and 4., below.

2. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons per year (TPY) for any individual HAP and 24.9 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

3. The permittee shall collect and record the following information each month for this facility, including emission units R003:

   a) the company identification for each HAP-emitting material (i.e., all HAP-containing coatings, clean-up materials, resins, adhesives, potting compounds, plating chemicals, etc.);

   b) the individual HAP content of each HAP emitting material;

   c) the total combined HAP content of each HAP emitting material (i.e. sum of individual HAP contents from b);

   d) the amount of each HAP emitting material employed during the previous calendar month;

   e) the hours of operation, or other emissions determining rationale, of all HAP-generating sources;

   f) the total individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in pounds or tons per month;

   g) the total combined HAP emissions from all HAP emitting materials employed and all HAP-generating sources, in pounds or tons per month;

   h) the rolling, 12-month summation of individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons; and

   i) the rolling, 12-month summation of total combined HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons.

   The permittee shall have the option of using the potential to emit in place of the recordkeeping described in B.3 for any “de minimis” or exempt emissions unit for purposes of complying with the facility-wide HAP(s) limitations. Furthermore, the permittee shall have the flexibility to use purchasing records in lieu of recordkeeping requirement as stated in B.3.d) for purposes of complying with the facility-wide HAP(s) limitations.

4. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:

   a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

      The rolling 12 individual HAP emissions is equal to or greater than 9.9 tons from this facility; and

      The rolling 12 month combined HAP's emissions are equal to or greater than 24.9 tons from this facility.

   b) the probable cause of each deviation (excursion);

   c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

   d) the magnitude and duration of each deviation (excursion).

   If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

   The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

   [OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

C. Emissions Unit Terms and Conditions

1. R002, Paper Machine

Operations, Property and/or Equipment Description:

Converts bales of pulp to paper by adding then removing water, rewind paper into individual rolls slitting

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

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

a. b)(1)d. and d)(2), below.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704(T)	The VOC emissions from this emissions unit shall not exceed 12.6 pounds per hour.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	The emissions of from this emissions unit shall not exceed 19.2 tons per rolling 12 month period.
c.	OAC rule 3745-21-07(M)	Exempt. See section b)(2)c., below.
d.	OAC rule 3745-114-01	Ohio Toxic Rule.

(2) Additional Terms and Conditions

a. The 12.6 lbs. VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to

establish record keeping and reporting requirements to ensure compliance with this limit.

[Authority for term ORC 3704(T)]

b. The maximum annual liquid polymer throughput for this emissions unit shall not exceed 65.0 tons, based upon a rolling 12 month period.To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the paper throughput levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Paper Throughput, (in tons)
1	6.5
1-2	13.0
1-3	19.5
1-4	26.0
1-5	32.5
1-6	39.0
1-7	45.5
1-8	52.0
1-9	58.5
1-10	65.0
1-11	65.0
1-12	65.0

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual paper throughput limitation shall be based upon a rolling 12 month period of the paper processed.

c. Emissions unit is exempt under OAC rule 3745-21-07(A)(5), requirements shall not apply to any source, including any new source, for which installation commenced after the effective date of this rule, February 18, 2008.

c) Operational Restrictions

(1) The amount of liquid polymer employed in this emissions unit shall not exceed 65.0 tons per rolling 12 month period.

(2) The volatile organic compound (VOC) content of the liquid polymer employed shall not exceed 30.0% by weight.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information monthly records:

a. The total amount of liquid polymer, in tons,

b. The total combined rolling, 12-month summation of liquid polymer employed, in tons. The rolling, 12-month summation of the total liquid polymer employed, (the

total amount of liquid polymer employed for the current month ("a") plus the total amount of liquid polymer employed for the 11 previous calendar months);

c. The VOC/OC emissions, in tons per rolling 12 month period, (the summation of (“b”) x 0.30*); and

d. The total combined rolling, 12-month summation of VOC/OC emissions, in tons. The rolling, 12-month summation of the VOC/OC emissions, (the total VOC/OC emissions for the current month ("a") plus the total amount of VOC/OC emissions for the 11 previous calendar months);

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative paper processed, in tons for each calendar month.

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

e) Reporting Requirements

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict thepotential to emit (PTE) of any regulated air pollutant and have been detected bythe monitoring, record keeping and/or testing requirements in this permit:

i. an identification of each month during which the VOC material employed exceeded 19.2 tons per rolling 12 month period;

ii. an identification of each time the volatile organic compound (VOC) content of the liquid polymer employed exceeds 30.0% by weight and

iii. for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative paper throughput, as listed in section b)(2) of this permit.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

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

a. Emission Limitation:

12.6 lbs. of VOC/OC per hour.

The above limitation is based on the following equation:

HER = LPt x Vc

Where:

HER = Hourly emission rate, in pounds;

LPt = Liquid polymer usage, in pounds per hour, (40.4, application); and

Vc = VOC content, in percent by weight, (30% (0.3)).

Applicable Compliance Method:

Compliance shall be assumed based on the maximum hourly liquid polymer usage not exceeding 40.4, and the VOC content of the liquid polymer not exceeding 30% by weight. Prior to modifying this emissions unit that would increase the amount of paper and/or organic compounds employed, the permittee shall apply for and obtain all appropriate air pollution permits.

If required, compliance shall be based upon stack testing performed in accordance with USEPA Reference Method 18 or 25.

b. Emission Limitation:

19.2 tons of VOC/OC per rolling 12 month period.

The above limitation is based on the following equation:

AER = (LPt x Vc)/2000

Where:

AER = Annual emission rate, in tons per rolling 12 month period;

LPt = Liquid polymer usage, in tons per year, (65); and

Vc = VOC content, in percent by weight, (30% (0.3)).

Applicable Compliance Method:

Compliance shall be based upon the record keeping and reporting requirements as specified in sections d) and e) of this permit.

g) Miscellaneous Requirements

(1) None.