



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

RE: PERMIT TO INSTALL MODIFICATION
PUTNAM COUNTY
Application No: 03-09479

CERTIFIED MAIL

DATE: 9/14/2000

Philips Display Components Ottawa Plant
Charles Melquist
700 North Pratt Street
Ottawa, OH 458751554

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 9/14/2000
Effective Date: 9/14/2000**

ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-09479

Application Number: **03-09479**
APS Premise Number: **0369000128**
Permit Fee: **\$100**
Name of Facility: **Philips Display Components Ottawa Plant**
Person to Contact: **Charles Melquist**
Address: **700 North Pratt Street
Ottawa, OH 458751554**

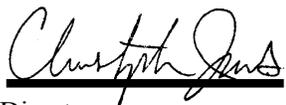
Location of proposed air contaminant source(s) [emissions unit(s)]:
**700 North Pratt Street
Ottawa, OHIO**

Description of modification:
Modification to PTI #03-09479 issued 04/09/97 to allow for increase in VOC emissions unit P166 based upon additional information from the company.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Director

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GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental 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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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 and regulations.

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Ohio EPA Source <u>Number</u>	Source Identification <u>Number</u>	BAT <u>Determination</u>	Applicable Federal & <u>OAC Rules</u>	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for **Philips Display Components Ottawa Plant** located in **PUTNAM** County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Lehr Oven No. 4

Ohio EPA Source <u>Number</u>	P166	Source Identification <u>Description</u>	Lacquer Line 7
L002	P173	Conveyorized Belt Degreaser	
	P173 Cont'd		

L003		Conveyorized Belt Degreaser	
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P175

P162 (former-ly P020B)	P174	Frit Dryer No. 2 and associated conveyors and incinerators (electric)	Lacquer Line 8
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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		Incinerator with 95% destruction efficiency and 100% capture efficiency	Catalytic Regenerative Incinerator with 95% destruction efficiency and 100% capture efficiency	Applicable Federal & OAC Rules 3745-31-05 3745-21-09 (O)(4)
	<u>BAT Determination</u> Carbon Adsorber			3745-31-05 3745-21-09 (O)(4)
	Carbon Adsorber			3745-31-05 3745-21-09 (O)(4)
Lacquer Line 9		Catalytic Regenerative Incinerator with 95% destruction efficiency and 100% capture efficiency		3745-31-05 3745-21-07 (G)(1)
	Catalytic Regenerative Incinerator			3745-31-05 3745-21-07 (G)(1)
	Compliance with 3745-21-07 (G)(1)			3745-31-05 3745-21-07 (G)(1)
	Catalytic Regenerative			3745-31-05 3745-21-07 (G)(2)

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		Permit Allowable Mass Emissions and/or Control/Usage Requirements	P174, and P175 combined; 3.6 tons OC per rolling 12-month summation for emissions units P173, P174, and P175 combined; 0.27 pound per hour of toluene for each emission unit P173 through P175; 0.007 pound per hour of methanol for each emission unit P173 through P175 (See Additional Terms and Conditions #2)	(See Additional Terms and Conditions #2)
	3745-31-05	6.44 lbs/hr; 29.1 tons/yr VOC; 25 ppm trichloroethylene in the carbon adsorber exhaust gases (See Additional Terms and Conditions #1)	0.30 ton per month of OC for emissions units P173, P174, and P175 combined; 0.27 pound per hour of toluene for each emission unit P173 through P175; 0.007 pound per hour of methanol for each emission unit P173 through P175 (See Additional Terms and Conditions #2)	0.30 ton per month of OC for emissions units P173, P174, and P175 combined; 3.6 tons OC per rolling 12-month summation for emissions units P173, P174, and P175 combined; 0.27 pound per hour of toluene for each emission unit P173 through P175 (See Additional Terms and Conditions #2)
3745-31-05	3745-21-07 (G)(2)	8.61 lbs/hr; 37.7 tons/yr VOC; 25 ppm trichloroethylene in the carbon adsorber exhaust gases (See Additional Terms and Conditions #1)	0.30 ton per month of OC for emissions units P173, P174, and P175 combined; 3.6 tons OC per rolling 12-month summation for emissions units P173, P174, and P175 combined; 0.27 pound per hour of toluene for each emission unit P173 through P175; 0.007 pound per hour of methanol for each emission unit P173 through P175	
3745-21-07 (G)(2)		3 pounds per hour, 15 pounds per day, and 2.5 tons per year OC		
		3 pounds per hour, 15 pounds per day, 0.62 lb VOC/hr and 2.73 TPY VOC		
		0.30 ton per month of OC for emissions units P173,		

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC (not including VOC)	6.6 (3.6 tons per rolling 12-month summation for P173 through P175 combined, 2.5 tons per year for P162, and 0.5 ton per year for P166)
VOC	66.8 (29.1 tons per year for L002, and 37.7 tons per year for L003)

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the

acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutants(s):

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<u>Source</u>	<u>Pollutant(s)</u>
P173- P175	toluene, methanol, total OC
P162, P166	total OC
L002, L003	VOC

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Additional Terms and Conditions for L002 and L003:

- a. Each conveyORIZED degreaser shall employ equipment, such as a drying tunnel or rotating (tumbling) basket, to minimize the carry-out of solvent liquid or vapor during removal of cleaned parts.
- b. The following safety switches shall be operated and maintained for each conveyORIZED degreaser:
 - i. a condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser is either not circulating or too warm;
 - ii. a spray safety switch which shuts off the spray pump if the vapor level drops below any fixed spray nozzle; and,
 - iii. a vapor level control thermostat or any other device which shuts off the sump heat when the vapor level rises too high.
- c. A carbon adsorption system shall be employed to control the volatile organic compound (VOC) emissions from L002. A carbon adsorption system shall also be employed to control the VOC emissions from L003. Each system shall have ventilation greater than or equal to 50 cubic feet per minute per square foot (cfm/sq. ft.) of air/solvent interface (when downtime covers are open), and shall exhaust less than 25 parts per million (ppm) of solvent by volume averaged over a complete adsorption cycle. The carbon adsorption systems shall be operated at all times except during maintenance.

2. Additional Terms and Conditions for P173 through P175:

A catalytic incinerator shall be employed to reduce captured OC emissions by 95%. The lacquer line shall be maintained within a permanent total enclosure which shall provide 100% capture efficiency of all OC emissions from emissions units P173, P174 and P175.

3. Operational Restrictions for L002 and L003:

- a. Each conveyORIZED degreaser shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:

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- i. use no workable fans near the degreaser opening, and ensure that exhaust ventilation does not exceed 65 cfm/sq. ft of degreaser opening, unless a higher rate is necessary to meet Occupational Safety and Health Administration requirements;
 - ii. minimize openings during operation so that entrances and exits silhouette workloads with the average clearance between the parts and the edge of the degreaser opening of less than ten percent of the width of the opening;
 - iii. provide downtime covers for closing off the entrance and exit during shutdown hours;
 - iv. minimize carry-out emissions by:
 1. racking parts so that solvent drains freely from parts and is not trapped; and,
 2. maintaining the vertical conveyor speed at less than eleven feet per minute.
 - v. store waste solvent only in covered containers;
 - vi. repair solvent leaks immediately, or shut down the degreaser;
 - vii. operate the degreaser such that water cannot be visually detected in solvent exiting the water separator;
 - viii. place downtime covers over entrances and exits of the conveyORIZED degreaser at all times when the conveyors and exhausts are not being operated; and,
 - ix. clean only materials that are neither porous nor absorbent.
- b. The average VOC concentration in the exhaust gases from the carbon adsorber, during any complete adsorption cycle, shall not exceed 25 ppm.

4. Operational Restriction for P173 through P175:

- a. The doors to the lacquer line room shall remain closed at all times except for entry or exit or for an emergency.
- b. To minimize fugitive emissions, all spent cleanup solvent which will not be reused shall be returned to the waste recovery tank from a point within the permanent total enclosure of the lacquer line room.

- c. The lacquer shall contain no more than 95% toluene by volume, and toluene shall be the only VOC in the lacquer.
- d. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (in inches of water) established during the most recent emission test that demonstrated the emissions unit was in compliance.
- e. The average temperature of the exhaust gases at the inlet to the catalytic incinerator, for any three-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

5. Monitoring and/or Recordkeeping Requirements for L002 and L003:

- a. The concentration of VOCs in the exhaust gases from each carbon adsorber shall be monitored continuously with an organic monitoring device and recorder which measures and records the concentrations when the source is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- b. The permittee shall maintain records of the following information:
 - i. all control equipment maintenance, such as replacement of the carbon in the carbon adsorption unit; and,
 - ii. the results of any tests conducted to demonstrate compliance with the 50 cfm/sq/ft ventilation rate or the 25 ppm VOC emission limitation.
- c. The permittee shall collect and record the following information each day:
 - i. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and,
 - ii. the average VOC concentration in the exhaust gases from the carbon adsorber during each complete adsorption cycle during the day.

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- d. The permittee shall also maintain monthly records of the following information:
 - i. company identification of the solvent;
 - ii. the total number of gallons and pounds of solvent added as make-up to the emissions unit;
 - iii. the concentration of the solvent in the wastewater discharged to the sewer system from the carbon adsorption system, including all analyses used to determine the VOC concentration in the wastewater;
 - iv. the amount of wastewater discharged to the sewer system from the carbon adsorption system, in gallons and pounds as determined by measuring the steam flow rate used for regeneration of the carbon bed;
 - v. the total amount of solvent discharged to the sewer system from the carbon adsorption system, in pounds; and,
 - vi. the total amount of solvent emitted, in pounds and tons [i.e., (ii) minus (v)].

6. Monitoring and/or Recordkeeping Requirements for P173 through P175:

- a. The permittee shall maintain the lacquer line room, at all times that the catalytic incinerator is operating, at an air pressure which is less than the pressure of the air immediately outside the lacquer line room. The minimum differential pressure between the air inside and that outside of the room shall be established at the time of emissions testing, and shall be approved in writing by Ohio EPA. A pressure gauge capable of measuring this differential pressure shall be installed in an easily accessible area. The differential pressure readings shall be monitored and recorded continuously.
- b. The permittee shall operate and maintain a continuous temperature monitor and recorder which measure and records the temperature of the exhaust gases immediately before and after the catalyst bed of the incinerator and the average temperature across the catalyst bed in contiguous 3-hour time blocks. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor and recorder shall be guaranteed by the manufacturer to be within 1 percent of the temperature being measured or 5 degrees Fahrenheit, whichever is greater.
- c. Instruments, recorders or other devices used to verify compliance shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. All calibrations and maintenance shall be documented and recorded.
- d. All lacquer supplied to sources P173 through P175 shall be supplied through one flow meter

capable of measuring and recording the volume of lacquer employed daily to an accuracy of plus or minus 0.2%. The volume percent of toluene in the lacquer shall be considered to be 95% for the purpose of these calculations. The volume of toluene in the lacquer supplied shall be converted to pounds and recorded daily. The weight of toluene used shall be summed for each calendar month and recorded in pounds.

- e. All pure toluene supplied to sources P173 through P175 shall be supplied through one flow meter capable of measuring and recording the volume of toluene employed daily to an accuracy of plus or minus 0.2%. The volume of toluene supplied shall be converted to pounds and recorded daily. The daily pounds shall be summed for each calendar month and recorded.
- f. The monthly sums of toluene usage recorded pursuant to paragraphs d and e shall be added and recorded monthly.
- g. The weight of all methanol supplied to sources P173 through P175 shall be either determined gravimetrically or through the use of a flowmeter capable of measuring and recording the volume of methanol employed daily to an accuracy of plus or minus 0.2%. The volume of methanol supplied shall be converted to pounds and recorded daily. The daily pounds shall be summed for each calendar month and recorded.
- h. The weights of toluene and methanol recovered from the waste recovery tank shall be calculated each month from the total weight of recovered material and the analysis of a representative sample. If no recovery has been made in a particular calendar month, the weights shall be recorded as zero. The weights of toluene and methanol recovered from the waste recovery tank shall each be recorded for each calendar month. The weight of toluene recovered each month shall be subtracted from the weight of toluene usage each month as determined in paragraph 6. The resulting number shall be recorded each month as the nominal weight of toluene emitted before controls. The weight of methanol recovered each month shall be subtracted from the weight of methanol usage each month as determined in paragraph 7. The resulting number shall be recorded each month as the nominal weight of the methanol emitted before controls.
- i. The permittee shall also collect and record the following information each month:
 - i. the name and identification of each cleanup material employed in the line;
 - ii. the number of gallons of each cleanup material employed;
 - iii. the OC content of each cleanup material, in pounds of OC per gallon;
 - iv. the calculated, uncontrolled OC emission rate from all cleanup materials, in pounds and tons per month;

- v. the calculated, controlling OC emission rate from all cleanup materials, using an overall capture and destruction efficiency of 95%, in pounds and tons per month;
- vi. the total controlled OC emissions from all the lacquer, pure toluene, methanol solution employed, calculated from the nominal weights of toluene and methanol emitted before controls (from paragraph viii of this section), and using an overall capture and destruction efficiency of 95%, in pounds and tons per month;
- vii. the total controlled OC emissions from all the lacquer, pure toluene, methanol solution and cleanup materials employed, in pounds and tons per month, calculated from sections e and f of this paragraph;
- viii. the rolling, twelve-month summation of the total controlled OC emissions from all the lacquer, pure toluene, methanol solution and cleanup materials employed, in tons.

7. Monitoring and/or Recordkeeping Requirements for P162:

The permittee shall maintain monthly records which list the following information for the emissions unit:

- a. the number of funnels dried;
- b. the pounds of frit applied per funnel;
- c. the pounds of VOC per pound of frit applied;
- d. the estimated percent of VOC evaporated in this process (% VOC evaporated from the dryer and the % VOC evaporated from the conveyor leaving the dryer); and,
- e. the tons of VOC emitted (E_{VOC}), determined in accordance with the following equations:

$$E_{VOC} = \# \text{ funnels dried} \times \frac{\text{lb frit applied}}{\text{funnel}} \times \frac{\text{lb VOC}}{\text{lb frit}} \times \frac{\text{ton VOC}}{2000 \text{ lbs VOC}} \times$$

$$\left\{ \frac{\%VOC \text{ from dryer}}{100\%} - (\text{evaporated}) \right\} (.95) \left[\frac{\text{lb VOC}}{100\%} \right] +$$

$$\left\{ \frac{\%VOC \text{ from conveyor}}{100\%} - (\text{evaporated}) \right\} (.965) (.85) \left[\frac{\text{lb VOC}}{100} \right]$$

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8. Monitoring and/or Recordkeeping Requirements for P166:

The permittee shall maintain monthly records which list the following information for the emissions unit:

- a. the number of funnels processed;
- b. the pounds of frit applied per funnel;
- c. the pounds of VOC per pound of frit applied;
- d. the estimated percent of VOC released in this process (% VOC released from the oven prior to autoignition); and,
- e. the tons of VOC emitted (E_{VOC}), determined in accordance with the following equation:

$$E_{VOC} = \# \text{ funnels produced} \times \frac{\text{lb frit applied}}{\text{funnel}} \times \frac{\text{lb VOC}}{\text{lb frit}} \times \frac{\text{ton VOC}}{2000 \text{ lbs VOC}} \times \frac{1}{100\%} \times \% \text{ VOC released (from oven prior to autoignition)}$$

9. Reporting Requirements for L002 and L003:

- a. The permittee shall submit quarterly VOC concentration deviation (excursion) reports that identify all complete adsorption cycles during which the average VOC concentration in the exhaust gases from the carbon adsorber exceeded the concentration limitation of 25 ppm.
- b. The permittee shall submit annual reports which provide the total VOC emissions from each emissions unit for the previous calendar year. These annual reports shall be submitted by January 31 of each year.

10. Reporting Requirements for P173 through P175:

- a. The permittee shall submit quarterly reports to the Ohio EPA documenting each exceedance of the monthly emission limitation, the rolling twelve-month emission limitation, the pressure differential requirement, and the incinerator temperature limitation, including the following additional information:
 - i. the cause of the deviation;

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- ii. for the temperature deviation, an identification of all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed is more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the source was in compliance, and all 3-hour blocks of time during which the average temperature difference across the catalyst bed is less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the source was in compliance; and,
- iii. the steps that have been/and or will be taken to correct the violation and prevent further deviations.

The reports shall be submitted by April 30, July 31, October 31 and January 31 and shall cover the previous calendar quarters. If there have been no exceedances, the reports stating that fact shall be submitted.

- b. The permittee shall submit by January 31, an annual report of the controlled organic compound emissions for the previous calendar year.

11. Reporting Requirements for P162 and P166:

By January 31 of each year, the permittee shall submit an annual report which documents the VOC emissions from each emissions unit in tons, for the previous calendar year.

12. Reporting Requirements for all emission units in this permit:

All reports shall be submitted to the Ohio Environmental Protection Agency, Division of Air Pollution Control, Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.