



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
PIKE COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 06-06474

Fac ID: 0666010033

DATE: 8/2/2007

Mills Pride Limited Partnership
Debra Hannah
423 Hopewell Rd
Waverly, OH 45690-9700

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 of the Director is final 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 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

Sincerely,

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

CC: USEPA

SEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/2/2007
Effective Date: 8/2/2007**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 06-06474

Application Number: 06-06474
Facility ID: 0666010033
Permit Fee: **\$800**
Name of Facility: Mills Pride Limited Partnership
Person to Contact: Debra Hannah
Address: 423 Hopewell Rd
Waverly, OH 45690-9700

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

**423 Hopewell Rd
Waverly, Ohio**

Description of proposed emissions unit(s):

Administrative modification to remove PM emission limits for R002 R003 and R004.

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

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

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4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to

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the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

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12. 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.

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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or 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.

5. Construction of New Sources(s)

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

6. 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.

7. Applicability

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

8. Construction Compliance Certification

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

C. 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>
VOC	130.91

This is an Administrative Modification of PTI 06-06474 that was originally issued Final on October 4, 2001. The original PTI was issued Draft, therefore this modification will need to be issued Draft as well.

Operations at the Waverly Plant include wood coating operations such as the Flatline Finishing System Spray Booths (OEPA Emission Unit ID K001), the Specialty Spray Booth (R001), the Cefla Roll Coaters (R002, R003, and R004), and the Backline Finishing System Spray Booth (R011).

Removal of PM Emissions Limits For Roll Coating Operations

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PTI 06-06474 contains particulate matter (PM) emission limits for the Cefla Line Roll Coaters (R002, R003, and R004) pursuant to OAC 3745-17-11(B) and opacity limits per OAC 3745-17-07(A). However, in the Cefla Lines the coating is applied to the wood products via roll coating. The coating is not sprayed or atomized. As a result, PM emissions do not result from the Cefla Lines. Mill's Pride has requested that the PM and opacity emission limits, and the associated monitoring, record keeping and testing requirements, be removed from PTI 06-06474 for R002, R003, and R004.

Removal Of Opacity Limits During RTO Bakeouts

The wood coating operations listed above (K001, R001 - R004, and R011) are all controlled by a regenerative thermal oxidizer (RTO), as required by PTI 06-06474. Mill's Pride performs scheduled, routine bakeouts of the RTO twice

per year. A bakeout operation holds the RTO chamber in outlet mode and raises the temperature of the bed above 1500°F. The bakeout is required to remove organic materials from the chamber and typically lasts 4 hours. During the bakeout, the emission units controlled by the RTO are not in operation. PTI 06-06474 contains an emissions requirement pursuant to OAC 3745-17-07(A) which limits visible particulate emissions to 20 percent opacity as a 6-minute average from all stacks. Mill's Pride reviewed OAC 3745-17-07(A) to determine if the opacity requirements apply to the RTO when the coating operations are not in operation (i.e., during the bakeout events).

OAC 3745-17-07(A)(3)(h) states that the visible particulate emission limitations in OAC 3745-17-07(A)(1) do not apply to any air contaminant source which is not subject to any mass emission limitation in OAC 3745-17-08(B)(3) and (B)(4) or in 3745-17-09, 3745-17-10, or 3745-17-11.

The requirements of OAC 3745-17-08(B)(3) and (B)(4) are applicable to fugitive dust sources, and therefore do not apply to the RTO stack.

The requirements of OAC 3745-17-09 apply to incinerators. Pursuant to OAC 3745-17-01(B)(9), an "incinerator" is defined as "any equipment, machine, device, article, contrivance, structure, or part of a structure used to burn liquid, semi-solid or solid refuse or to process salvageable materials by burning other than by open burning." The RTO is used to destroy *gaseous* refuse (i.e, VOC resulting from the coating operations), not liquid, semi-solid, or solid refuse. Thus, the RTO does not meet the definition of "incinerator" and is not subject to the requirements of OAC 3745-17-09.

The requirements pursuant to OAC 3745-17-10 apply to "installations in which fuel, including any product or by-product of a manufacturing process, is burned for the primary purpose of producing heat or power by indirect heat transfer." The RTO is a direct-fired source, and not for the primary purpose of producing heat or power. As a result, the RTO is not subject to the requirements of OAC 3745-17-10.

Finally, the RTO is not subject to the requirements of OAC 3745-17-11 because it is used for the "burning of refuse" per the exemption in OAC 3745-17-11(A)(1)(b). "Refuse" is defined in OAC 3745-17-01 as "any discarded matter, or any matter which is to be reduced in volume, or otherwise changed in chemical or physical properties, in order to facilitate its discard, removal or disposal."

Therefore, pursuant to OAC 3745-17-07(A)(3)(h), the RTO, when operated during bakeout events, is not subject to the requirements of OAC 3745-17-07(A) as long as K001, R001 - R004 and R011 are

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not in operation. As a result, Mill's Pride is requesting an administrative modification to include language in PTI 06-06474 indicating that the opacity limitation does not apply during bakeout events.

Equipment Description Modification - Backline Finishing System

The Backline Finishing System (R011) was originally designed and permitted to consist of one spray booth and one drying oven. After startup, PTI 06-06474 was then issued allowing construction of a second spray booth and drying oven. However, the second spray booth and oven were never installed after issuance of PTI 06-06474. Also, the drying oven is actually an ultraviolet (UV) drying oven, rather than an infrared (IR) oven, as it is listed in PTI 06-06474.

Additional comments: None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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	Applicable Rules/Requirements	
K001 - Flatline Finishing System (system includes 3 spray booths, 1 dryer, and 2 curing ovens controlled by a Regenerative Thermal Oxidizer) Administrative Modification of PTI 06-06474 issued on October 4, 2001 to correct rule citations.	OAC rule 3745-21-07(G)(1)	OAC rule 3745-31-05(C) (Synthetic Minor to avoid MACT)
	OAC rule 3745-21-07(G)(6)(a)	OAC rule 3745-17-07(A)
	OAC rule 3745-21-07(G)(2)	OAC rule 3745-17-11(B) (Table 1)
	OAC rule 3745-31-05(A)(3)	

Mills |

PTI A

Modification Issued: 8/2/2007

Emissions Unit ID:K001

<p>Applicable Emissions Limitations/Control Measures</p>	<p>compound (VOC) emissions shall not exceed 40.94 lbs/hr and 74.08 tons/yr. See section A.1.2.a.</p>
<p>The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.1.2.a.</p>	<p>Compliance with this rule also includes compliance with OAC rules 3745-17-07(A) and 3745-17-11(B)</p>
<p>The emission reduction requirement specified in this rule (90% or more of the carbon in the organic material being incinerated) is less stringent to the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.1.2.a.</p>	<p>The total facility Hazardous Air Pollution (HAP) emissions shall be less than 10 tons per year of a individual HAP, and 25 tons per year of a total of HAPs.</p>
<p>The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.1.2.a.</p>	<p>Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p>
<p>Volatile organic</p>	<p>See section A.1.2.b. Particulate emissions shall not exceed 0.551 lb/hr.</p>

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Emissions Unit ID:K001

2. Additional Terms and Conditions

- 2.a** The facility shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a Regenerative Thermal Oxidizer (RTO) control efficiency (i.e., destruction or removal efficiency) which is at least 90%, by weight, for this emissions unit.
- 2.b.** Pursuant to OAC rule 3745-17-07(A)(3)(h), the opacity limitation required by OAC rule 3745-17-07(A) does not apply to the RTO stack during bakeout events, provided that the emission units controlled by the RTO that have particulate emission limits(K001, R001, and R011) are not in operation during the bakeout event.

II. Operational Restrictions

1. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, 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.
2. The total facility Hazardous Air Pollution (HAP) emissions shall be less than 10 tons per year of a individual HAP, and 25 tons per year of a total of HAPs. The tons per year limits, shall be based upon a rolling twelve month period. The total facility limits are required to be federally enforceable in order to be exempt this facility from 40 CFR 63, Subpart JJ.
3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the

Emissions Unit ID:K001

control equipment:

- a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the following information each day for materials used in the emission unit.
- a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon, excluding water.
 - d. The total uncontrolled VOC emission rate in pounds (the sum of (b)x(c) for all coatings employed).
 - e. The total controlled VOC emission rate for all coatings and cleanup materials, in pounds (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).
 - f. The hours of operation of the emissions unit.
 - g. The calculated average hourly emission rate in pounds per hour, based upon the total daily coatings employed and the actual hours of operation of the emission unit.
 - h. The total controlled VOC emissions from all coatings and cleanup materials employed year to date, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.).
3. The permittee shall collect and record the following information each month for materials used at the facility.
- a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.

- c. The total HAP content of each coating, thinner, and cleanup material in pounds per gallon.
- d. The total uncontrolled HAP emission rate in tons (the sum of (b)x(c)x(0.0005 ton/lb).
- e. The total controlled HAP emission rate for all coatings and cleanup materials, in tons (i.e., calculated using the overall control efficiency from the most recent performance test).
- f. The individual HAP content of each coating, thinner, and cleanup material in pounds per gallon.
- g. The total uncontrolled individual HAP emission rate in tons (the sum of (b)x(g)x(0.0005 ton/lb).
- h. The total controlled individual HAP emission rate for all coatings and cleanup materials, in tons (i.e., calculated using the overall control efficiency from the most recent performance test).
- i. The rolling, 12-month summation of the data required in sections A.III.3.f. and A.III.3.i. above(i.e., the 12-month summations for individual HAP and total HAPs shall be calculated each month by adding the emission rate for the month to the emission rate for the previous 11 calendar months).

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
- 2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- 3. The quarterly summaries shall be submitted, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

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4. The permittee shall notify the Director (the Ohio EPA Southeast District Office) of any monthly record showing emissions in excess of the rolling, 12-month limitation specified in A.II. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation

20% opacity

Applicable Compliance Method

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

- b. Emission Limitation

40.94 lb/hr VOC (based on a daily average)

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.2. above.

- c. Emission Limitation

74.08 TPY of VOC

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.2

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d. Emission Limitation

90% destruction efficiency / 90% overall reduction of emissions

Applicable Compliance Method

Compliance shall be determined in accordance with 40 CFR 60 Appendix A, Method 25 or 25A, the procedures specified in OAC rule 3745-21-10 and the requirements found in Sections A.III and A.IV.

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

2. The emission testing shall be conducted as specified by the permittee's Title V permit.
3. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC and the capture efficiency and control efficiency limitations for VOC.
4. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Method 25 or 25A of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
5. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
6. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air

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agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

a. Emission Limitation

Total facility individual HAP emission less than 10 TPY.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.3. above.

b. Emission Limitation

Total facility HAP's emissions less than 25 TPY.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.3

c. Emission Limitation

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0.551 lb/hr of Particulate Matter

Applicable Compliance Method

Compliance with the particulate matter emission limitation in Section A.I. of these terms and conditions shall be determined in accordance with the following method:

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$E = \text{maximum coating solids usage rate (in pounds per hour)} * (1-TE) * (1-CE)$

$E = \text{particulate emissions rate (lb/hr)}$

$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.}$

$CE = \text{control efficiency of the control equipment (ie. booth filters)}$

d. Emission Limitation

2.4 TPY of PM

Applicable Compliance Method

Compliance shall be based upon a one time calculation of potential as follows:

$E = MHER * 8760 \text{ hr/yr} * 0.0005 \text{ Ton/lb} = \text{TPY}$

Where

MHER is the maximum controlled hourly emission rate determined in section A.V

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Flatline Finishing System (system includes 3 spray booths, 1 dryer, and 2 curing ovens controlled by a Regenerative Thermal Oxidizer) Administrative Modification of PTI 06-06474 issued on October 4, 2001 to correct rule citations.	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

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V. Testing Requirements

None

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VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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	Applicable Rules/Requirements
R001- Specialty booth finishing system (1 spray booth controlled by a Regenerative Thermal Oxidizer) Administrative Modification of PTI 06-06474 issued on October 4, 2001 to remove particulate limits from roll coating operations.	<p>OAC rule 3745-21-07(G)(1)</p> <p>OAC 3745-31-05(C) (Synthetic Minor to avoid MACT)</p> <p>OAC rule 3745-21-07(G)(6)(a)</p> <p>OAC rule 3745-17-07(A)</p> <p>OAC rule 3745-21-07(G)(2)</p> <p>OAC rule 3745-17-11(B) (Table 1)</p> <p>OAC rule 3745-31-05(A)(3)</p>

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<p>Applicable Emissions Limitations/Control Measures</p>	<p>2.01 tons/yr. See section A.I.2.a.</p>
<p>The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.I.2.a.</p>	<p>Compliance with this rule also includes compliance with OAC rules 3745-17-07(A) and 3745-17-11(B)</p> <p>The total facility Hazardous Air Pollution (HAP) emissions shall be less than 10 tons per year of a individual HAP, and 25 tons per year of a total of HAPs.</p>
<p>The emission reduction requirement specified in this rule (90% or more of the carbon in the organic material being incinerated) is less stringent to the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.I.2.a.</p>	<p>Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p> <p>See section A.I.2.b.</p>
<p>The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.I.2.a.</p>	<p>Particulate emissions shall not exceed 0.551 lb/hr.</p>
<p>Volatile organic compound (VOC) emissions shall not exceed 4.10 lbs/hr and</p>	

2. Additional Terms and Conditions

- 2.a** The facility shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a Regenerative Thermal Oxidizer (RTO) control efficiency (i.e., destruction or removal efficiency) which is at least 90%, by weight, for this emissions unit.
- 2.b.** Pursuant to OAC rule 3745-17-07(A)(3)(h), the opacity limitation required by OAC rule 3745-17-07(A) does not apply to the RTO stack during bakeout events, provided that the emission units controlled by the RTO that have particulate emission limits(K001, R001, and R011) are not in operation during the bakeout event.

II. Operational Restrictions

1. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, 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.
2. The total facility Hazardous Air Pollution (HAP) emissions shall be less than 10 tons per year of a individual HAP, and 25 tons per year of a total of HAPs. The tons per year limits, shall be based upon a rolling twelve month period. The total facility limits are required to be federally enforceable in order to be exempt this facility from 40 CFR 63, Subpart JJ.
3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the

control equipment:

- a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the following information each day for materials used in the emission unit.
- a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon, excluding water.
 - d. The total uncontrolled VOC emission rate in pounds (the sum of (b)x(c) for all coatings employed).
 - e. The total controlled VOC emission rate for all coatings and cleanup materials, in pounds (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).
 - f. The hours of operation of the emissions unit.
 - g. The calculated average hourly emission rate in pounds per hour, based upon the total daily coatings employed and the actual hours of operation of the emission unit.
 - h. The total controlled VOC emissions from all coatings and cleanup materials employed year to date, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.).
3. The permittee shall collect and record the following information each month for materials used at the facility.

- a. The company identification for each coating and cleanup material employed.
- b. The number of gallons of each coating and cleanup material employed.
- c. The total HAP content of each coating, thinner, and cleanup material in pounds per gallon.
- d. The total uncontrolled HAP emission rate in tons (the sum of $(b) \times (c) \times (0.0005 \text{ ton/lb})$).
- e. The total controlled HAP emission rate for all coatings and cleanup materials, in tons (i.e., calculated using the overall control efficiency from the most recent performance test).
- f. The individual HAP content of each coating, thinner, and cleanup material in pounds per gallon.
- g. The total uncontrolled individual HAP emission rate in tons (the sum of $(b) \times (g) \times (0.0005 \text{ ton/lb})$).
- h. The total controlled individual HAP emission rate for all coatings and cleanup materials, in tons (i.e., calculated using the overall control efficiency from the most recent performance test).
- i. The rolling, 12-month summation of the data required in sections A.III.3.f. and A.III.3.i. above (i.e., the 12-month summations for individual HAP and total HAPs shall be calculated each month by adding the emission rate for the month to the emission rate for the previous 11 calendar months).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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3. The quarterly summaries shall be submitted, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
4. The permittee shall notify the Director (the Ohio EPA Southeast District Office) of any monthly record showing emissions in excess of the rolling, 12-month limitation specified in A.II. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation

20% opacity

Applicable Compliance Method

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.
 - b. Emission Limitation

4.10 lb/hr VOC (based on a daily average)

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.2. above.
 - c. Emission Limitation

2.01 TPY of VOC

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Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.2.

d. Emission Limitation

90% destruction efficiency / 90% overall reduction of emissions.

Applicable Compliance Method

Compliance shall be determined in accordance with 40 CFR 60 Appendix A, Method 25 or 25A, the procedures specified in OAC rule 3745-21-10 and the requirements found in Sections A.III and A.IV.

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

2. The emission testing shall be conducted as specified by the permittee's Title V permit.
3. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC and the capture efficiency and control efficiency limitations for VOC.
4. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Method 25 or 25A of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
5. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
6. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the

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potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

a. Emission Limitation

Total facility individual HAP emission less than 10 TPY.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.3. above.

b. Emission Limitation

Total facility HAP's emissions less than 25 TPY.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section

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c. Emission Limitation

0.551 lb/hr of Particulate Matter

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Emissions Unit ID: R001

Applicable Compliance Method

Compliance with the particulate matter emission limitation in Section A.I. of these terms and conditions shall be determined in accordance with the following method:

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$$E = \text{maximum coating solids usage rate (in pounds per hour)} * (1-TE) * (1-CE)$$

$$E = \text{particulate emissions rate (lb/hr)}$$

$$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.}$$

$$CE = \text{control efficiency of the control equipment (ie. booth filters)}$$

d. Emission Limitation

2.4 TPY of PM

Applicable Compliance Method

Compliance shall be based upon a one time calculation of potential as follows:

$$E = \text{MHER} * 8760 \text{ hr/yr} * 0.0005 \text{ Ton/lb} = \text{TPY}$$

Where

MHER is the maximum controlled hourly emission rate determined in section A.V

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section**I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R001- Specialty booth finishing system (1 spray booth controlled by a Regenerative Thermal Oxidizer) Administrative Modification of PTI 06-06474 issued on October 4, 2001 to remove particulate limits from roll coating operations.	None	None

2. Additional Terms and Conditions**2.a** None**II. Operational Restrictions**

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

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None

V. Testing Requirements

None

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VI. Miscellaneous Requirements

None

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Emissions Unit ID: R002

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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	Applicable Rules/Requirements	
R002 - Cefla line stain roll coater /oven (1 rollcoater and curing oven controlled by a Regenerative Thermal Oxidizer) Administrative Modification of PTI 06-06474 issued on October 4, 2001 to remove particulate limits from roll coating operations.	OAC rule 3745-21-07(G)(1)	
	OAC rule 3745-21-07(G)(6)(a)	OAC 3745-31-05(C) (Synthetic Minor to avoid MACT)
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-31-05(A)(3)	

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Applicable Emissions
Limitations/Control
Measures

The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.1.2.a.

The emission reduction requirement specified in this rule (90% or more of the carbon in the organic material being incinerated) is less stringent to the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.1.2.a.

The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.1.2.a.

Total combined volatile organic compound (VOC) emissions from emission units R002, R003, and R004 shall not exceed 2.05 lbs/hr and 7.47 tons/yr.
See section A.1.2.a.

Compliance with this rule also includes compliance with OAC rules 3745-17-07(A) and 3745-17-11(B)

The total facility Hazardous Air Pollution (HAP) emissions shall be less than 10 tons per year of a individual HAP, and 25 tons per year of a total of HAPs.

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2. Additional Terms and Conditions

- 2.a** The facility shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a Regenerative Thermal Oxidizer (RTO) control efficiency (i.e., destruction or removal efficiency) which is at least 90%, by weight, for this emissions unit.

II. Operational Restrictions

1. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, 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.
2. The total facility Hazardous Air Pollution (HAP) emissions shall be less than 10 tons per year of a individual HAP, and 25 tons per year of a total of HAPs. The tons per year limits, shall be based upon a rolling twelve month period. The total facility limits are required to be federally enforceable in order to be exempt this facility from 40 CFR 63, Subpart JJ.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the following information each day for materials used in the emission unit.

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- a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon, excluding water.
 - d. The total uncontrolled VOC emission rate in pounds (the sum of (b)x(c) for all coatings employed).
 - e. The total controlled VOC emission rate for all coatings and cleanup materials, in pounds (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).
 - f. The hours of operation of the emissions unit.
 - g. The calculated average hourly emission rate in pounds per hour, based upon the total daily coatings employed and the actual hours of operation of the emission unit.
 - h. The total controlled VOC emissions from all coatings and cleanup materials employed year to date, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.).
3. The permittee shall collect and record the following information each month for materials used at the facility.
- a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The total HAP content of each coating, thinner, and cleanup material in pounds per
gallon.
 - d. The total uncontrolled HAP emission rate in tons (the sum of (b)x(c)x(0.0005 ton/lb).

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- e. The total controlled HAP emission rate for all coatings and cleanup materials, in tons (i.e., calculated using the overall control efficiency from the most recent performance test).
- f. The individual HAP content of each coating, thinner, and cleanup material in pounds per gallon.
- g. The total uncontrolled individual HAP emission rate in tons (the sum of (b)x(g)x(0.0005 ton/lb).
- h. The total controlled individual HAP emission rate for all coatings and cleanup materials, in tons (i.e., calculated using the overall control efficiency from the most recent performance test).
- i. The rolling, 12-month summation of the data required in sections A.III.3.f. and A.III.3.i. above(i.e., the 12-month summations for individual HAP and total HAPs shall be calculated each month by adding the emission rate for the month to the emission rate for the previous 11 calendar months).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The quarterly summaries shall be submitted, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
4. The permittee shall notify the Director (the Ohio EPA Southeast District Office) of any monthly record showing emissions in excess of the rolling, 12-month limitation specified in A.II. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

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Emissions Unit ID: R002

a. Emission Limitation

Total combined volatile organic compound (VOC) emissions from emission units R002, R003, and R004 shall not exceed 2.05 lbs/hr (based on a daily average)

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.2. above.

b. Emission Limitation

Total combined volatile organic compound (VOC) emissions from emission units R002, R003, and R004 shall not exceed 7.47 tons/yr.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.2

c. Emission Limitation

90% destruction efficiency / 90% overall reduction of emissions

Applicable Compliance Method

Compliance shall be determined in accordance with 40 CFR 60 Appendix A, Method 25 or 25A, the procedures specified in OAC rule 3745-21-10 and the requirements found in Sections A.III and A.IV.

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

2. The emission testing shall be conducted as specified by the permittee's Title V permit.
3. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC and the capture efficiency and control efficiency limitations for VOC.
4. The following test method(s) shall be employed to demonstrate compliance with the

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allowable mass emission rate(s): for VOC, Method 25 or 25A of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

5. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
6. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written

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Emissions Unit ID: R002

report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

a. Emission Limitation

Total facility individual HAP emission less than 10 TPY.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.3. above.

b. Emission Limitation

Total facility HAP's emissions less than 25 TPY.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.3

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R002

B. State Only Enforceable Section

I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R002 - Cefla line stain roll coater /oven (1 rollcoater and curing oven controlled by a Regenerative Thermal Oxidizer) Administrative Modification of PTI 06-06474 issued on October 4, 2001 to remove particulate limits from roll coating operations.	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

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Emissions Unit ID: R002

None

V. Testing Requirements

None

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Emissions Unit ID: R002

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R003

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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	Applicable Rules/Requirements
R003 - Cefla line roll coater #1/UV lamp (1 roll coater and ultraviolet curing oven controlled by a Regenerative Thermal Oxidizer) Administrative Modification of PTI 06-06474 issued on October 4, 2001 to remove particulate limits from roll coating operations.	<p>OAC rule 3745-21-07(G)(1)</p> <p>OAC 3745-31-05(C)</p> <p>OAC rule 3745-21-07(G)(6)(a)</p> <p>OAC rule 3745-21-07(G)(2)</p> <p>OAC rule 3745-31-05(A)(3)</p>

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Facility ID: 066601003

Emissions Unit ID: R003

Applicable Emissions
Limitations/Control
Measures

The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.1.2.a.

The emission reduction requirement specified in this rule (90% or more of the carbon in the organic material being incinerated) is less stringent to the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.1.2.a.

The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.1.2.a.

Total combined volatile organic compound (VOC) emissions from emission units R002, R003, and R004 shall not exceed

2.05 lbs/hr and 7.47 tons/yr.
See section A.1.2.a.

Compliance with this rule also includes compliance with OAC rules 3745-17-07(A) and 3745-17-11(B)

The total facility Hazardous Air Pollution (HAP) emissions shall be less than 10 tons per year of a individual HAP, and 25 tons per year of a total of HAPs.

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2. Additional Terms and Conditions

- 2.a** The facility shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a Regenerative Thermal Oxidizer (RTO) control efficiency (i.e., destruction or removal efficiency) which is at least 90%, by weight, for this emissions unit.

II. Operational Restrictions

1. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, 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.
2. The total facility Hazardous Air Pollution (HAP) emissions shall be less than 10 tons per year of a individual HAP, and 25 tons per year of a total of HAPs. The tons per year limits, shall be based upon a rolling twelve month period. The total facility limits are required to be federally enforceable in order to be exempt this facility from 40 CFR 63, Subpart JJ.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall collect and record the following information each day for materials used in the emission unit.
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon, excluding water.
 - d. The total uncontrolled VOC emission rate in pounds (the sum of (b)x(c) for all coatings employed).
 - e. The total controlled VOC emission rate for all coatings and cleanup materials, in pounds (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).
 - f. The hours of operation of the emissions unit.
 - g. The calculated average hourly emission rate in pounds per hour, based upon the total daily coatings employed and the actual hours of operation of the emission unit.
 - h. The total controlled VOC emissions from all coatings and cleanup materials employed year to date, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.).

3. The permittee shall collect and record the following information each month for materials used at the facility.
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The total HAP content of each coating, thinner, and cleanup material in pounds per gallon.
 - d. The total uncontrolled HAP emission rate in tons (the sum of (b)x(c)x(0.0005

ton/lb).

- e. The total controlled HAP emission rate for all coatings and cleanup materials, in tons (i.e., calculated using the overall control efficiency from the most recent performance test).
- f. The individual HAP content of each coating, thinner, and cleanup material in pounds per gallon.
- g. The total uncontrolled individual HAP emission rate in tons (the sum of (b)x(g)x(0.0005 ton/lb)).
- h. The total controlled individual HAP emission rate for all coatings and cleanup materials, in tons (i.e., calculated using the overall control efficiency from the most recent performance test).
- i. The rolling, 12-month summation of the data required in sections A.III.3.f. and A.III.3.i. above(i.e., the 12-month summations for individual HAP and total HAPs shall be calculated each month by adding the emission rate for the month to the emission rate for the previous 11 calendar months).

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
- 2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- 3. The quarterly summaries shall be submitted, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
- 4. The permittee shall notify the Director (the Ohio EPA Southeast District Office) of any monthly record showing emissions in excess of the rolling, 12-month limitation specified in A.II. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.

V. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions

shall be determined in accordance with the following method(s):

a. Emission Limitation

Total combined volatile organic compound (VOC) emissions from emission units R002, R003, and R004 shall not exceed 2.05 lbs/hr.(based on a daily average)

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.2. above.

b. Emission Limitation

Total combined volatile organic compound (VOC) emissions from emission units R002, R003, and R004 shall not exceed 7.47 tons/yr.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.2

c. Emission Limitation

90% destruction efficiency / 90% overall reduction of emissions

Applicable Compliance Method

Compliance shall be determined in accordance with 40 CFR 60 Appendix A, Method 25 or 25A, the procedures specified in OAC rule 3745-21-10 and the requirements found in Sections A.III and A.IV.

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

2. The emission testing shall be conducted as specified by the permittee's Title V permit.
3. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC and the capture efficiency and control efficiency limitations for VOC.

4. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Method 25 or 25A of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
5. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
6. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

a. Emission Limitation

Total facility individual HAP emission less than 10 TPY.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.3. above.

b. Emission Limitation

Total facility HAP's emissions less than 25 TPY.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.3

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R003

B. State Only Enforceable Section

I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R003 - Cefla line roll coater #1/UV lamp (1 roll coater and ultraviolet curing oven controlled by a Regenerative Thermal Oxidizer) Administrative Modification of PTI 06-06474 issued on October 4, 2001 to remove particulate limits from roll coating operations.	None	None

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

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Emissions Unit ID: R003

None

V. Testing Requirements

None

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VI. Miscellaneous Requirements

None

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Emissions Unit ID: R004

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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	Applicable Rules/Requirements	
R004 - Cefla line roll coater #2/UV lamp (1 roll coater and ultraviolet curing oven controlled by a Regenerative Thermal Oxidizer) Administrative Modification of PTI 06-06474 issued on October 4, 2001 to remove particulate limits from roll coating operations.	OAC rule 3745-21-07(G)(1)	
	OAC rule 3745-21-07(G)(6)(a)	OAC 3745-31-05(C) (Synthetic Minor to avoid MACT)
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-31-05(A)(3)	

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Emissions Unit ID: R004

Applicable Emissions
Limitations/Control
Measures

The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.I.2.a.

The emission reduction requirement specified in this rule (90% or more of the carbon in the organic material being incinerated) is less stringent to the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.I.2.a.

The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.I.2.a.

Total combined volatile

organic compound (VOC) emissions from emission units R002, R003, and R004 shall not exceed 2.05 lbs/hr and 7.47 tons/yr.
See section A.I.2.a.

Compliance with this rule also includes compliance with OAC rules 3745-17-07(A) and 3745-17-11(B)

The total facility Hazardous Air Pollution (HAP) emissions shall be less than 10 tons per year of a individual HAP, and 25 tons per year of a total of HAPs.

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2. Additional Terms and Conditions

- 2.a The facility shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a Regenerative Thermal Oxidizer (RTO) control efficiency (i.e., destruction or removal efficiency) which is at least 90%, by weight, for this emissions unit.

II. Operational Restrictions

1. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, 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.
2. The total facility Hazardous Air Pollution (HAP) emissions shall be less than 10 tons per year of a individual HAP, and 25 tons per year of a total of HAPs. The tons per year limits, shall be based upon a rolling twelve month period. The total facility limits are required to be federally enforceable in order to be exempt this facility from 40 CFR 63, Subpart JJ.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall collect and record the following information each day for materials used in the emission unit.
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon, excluding water.
 - d. The total uncontrolled VOC emission rate in pounds (the sum of (b)x(c) for all coatings employed).
 - e. The total controlled VOC emission rate for all coatings and cleanup materials, in pounds (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).
 - f. The hours of operation of the emissions unit.
 - g. The calculated average hourly emission rate in pounds per hour, based upon the total daily coatings employed and the actual hours of operation of the emission unit.
 - h. The total controlled VOC emissions from all coatings and cleanup materials employed year to date, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.).

3. The permittee shall collect and record the following information each month for materials used at the facility.
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The total HAP content of each coating, thinner, and cleanup material in pounds per gallon.
 - d. The total uncontrolled HAP emission rate in tons (the sum of (b)x(c)x(0.0005 ton/lb).
 - e. The total controlled HAP emission rate for all coatings and cleanup materials, in tons (i.e., calculated using the overall control efficiency from the most recent performance test).

- f. The individual HAP content of each coating, thinner, and cleanup material in pounds per gallon.
- g. The total uncontrolled individual HAP emission rate in tons (the sum of $(b) \times (g) \times (0.0005 \text{ ton/lb})$).
- h. The total controlled individual HAP emission rate for all coatings and cleanup materials, in tons (i.e., calculated using the overall control efficiency from the most recent performance test).
- i. The rolling, 12-month summation of the data required in sections A.III.3.f. and A.III.3.i. above (i.e., the 12-month summations for individual HAP and total HAPs shall be calculated each month by adding the emission rate for the month to the emission rate for the previous 11 calendar months).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The quarterly summaries shall be submitted, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
4. The permittee shall notify the Director (the Ohio EPA Southeast District Office) of any monthly record showing emissions in excess of the rolling, 12-month limitation specified in A.II. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

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Emissions Unit ID: R004

a. Emission Limitation

Total combined volatile organic compound (VOC) emissions from emission units R002, R003, and R004 shall not exceed 2.05 lbs/hr. (based on a daily average)

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.2. above.

b. Emission Limitation

Total combined volatile organic compound (VOC) emissions from emission units R002, R003, and R004 shall not exceed 7.47 tons/yr.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.2

c. Emission Limitation

90% destruction efficiency / 90% overall reduction of emissions

Applicable Compliance Method

Compliance shall be determined in accordance with 40 CFR 60 Appendix A, Method 25 or 25A, the procedures specified in OAC rule 3745-21-10 and the requirements found in Sections A.III and A.IV.

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

2. The emission testing shall be conducted as specified by the permittee's Title V permit.
3. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC and the capture efficiency and control efficiency limitations for VOC.
4. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Method 25 or 25A of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance

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with the capture efficiency and control efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

5. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
6. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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Emissions Unit ID: R004

a. Emission Limitation

Total facility individual HAP emission less than 10 TPY.

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Emissions Unit ID: R004

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.3. above.

b. Emission Limitation

Total facility HAP's emissions less than 25 TPY.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.3

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R004

B. State Only Enforceable Section**I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R004 - Cefla line roll coater #2/UV lamp (1 roll coater and ultraviolet curing oven controlled by a Regenerative Thermal Oxidizer) Administrative Modification of PTI 06-06474 issued on October 4, 2001 to remove particulate limits from roll coating operations.	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

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Emissions Unit ID: R004

None

V. Testing Requirements

None

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Emissions Unit ID: R004

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R011

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. 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	Applicable Rules/Requirements
R011 - Backline Finishing System (1 spray booth, and 1 UV drying oven controlled by a Regenerative Thermal Oxidizer) Administrative Modification of PTI 06-06474 issued on October 4, 2001 to the number of booths and ovens.	<p>OAC rule 3745-21-07(G)(1)</p> <p>OAC 3745-31-05(C) (Synthetic Minor to avoid MACT)</p> <p>OAC rule 3745-21-07(G)(6)(a)</p> <p>OAC rule 3745-17-07(A)</p> <p>OAC rule 3745-21-07(G)(2)</p> <p>OAC rule 3745-17-11(B) (Table 1)</p> <p>OAC rule 3745-31-05(A)(3)</p>

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Emissions Unit ID: R011

Applicable Emissions
Limitations/Control
Measures

The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.I.2.a.

The emission reduction requirement specified in this rule (90% or more of the carbon in the organic material being incinerated) is less stringent to the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.I.2.a.

The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.I.2.a.

Volatile organic

compound (VOC) emissions shall not exceed 10.85 lbs/hr and 45.34 tons/yr.
See section A.I.2.a.

Compliance with this rule also includes compliance with OAC rules 3745-17-07(A) and 3745-17-11(B)

The total facility Hazardous Air Pollution (HAP) emissions shall be less than 10 tons per year of a individual HAP, and 25 tons per year of a total of HAPs.

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

See section A.I.2.b.

Particulate emissions shall not exceed 0.551 lb/hr.

2. Additional Terms and Conditions

- 2.a** The facility shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a Regenerative Thermal Oxidizer (RTO) control efficiency (i.e., destruction or removal efficiency) which is at least 90%, by weight, for this emissions unit.
- 2.b.** Pursuant to OAC rule 3745-17-07(A)(3)(h), the opacity limitation required by OAC rule 3745-17-07(A) does not apply to the RTO stack during bakeout events, provided that the emission units controlled by the RTO that have particulate emission limits(K001, R001, and R011) are not in operation during the bakeout event.

II. Operational Restrictions

1. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, 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.
2. The total facility Hazardous Air Pollution (HAP) emissions shall be less than 10 tons per year of a individual HAP, and 25 tons per year of a total of HAPs. The tons per year limits, shall be based upon a rolling twelve month period. The total facility limits are required to be federally enforceable in order to be exempt this facility from 40 CFR 63, Subpart JJ.
3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the

control equipment:

- a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the following information each day for materials used in the emission unit.
- a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon, excluding water.
 - d. The total uncontrolled VOC emission rate in pounds (the sum of (b)x(c) for all coatings employed).
 - e. The total controlled VOC emission rate for all coatings and cleanup materials, in pounds (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).
 - f. The hours of operation of the emissions unit.
 - g. The calculated average hourly emission rate in pounds per hour, based upon the total daily coatings employed and the actual hours of operation of the emission unit.
 - h. The total controlled VOC emissions from all coatings and cleanup materials employed year to date, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.).
3. The permittee shall collect and record the following information each month for materials used at the facility.
- a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.

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- c. The total HAP content of each coating, thinner, and cleanup material in pounds per gallon.
- d. The total uncontrolled HAP emission rate in tons (the sum of (b)x(c)x(0.0005 ton/lb).
- e. The total controlled HAP emission rate for all coatings and cleanup materials, in tons (i.e., calculated using the overall control efficiency from the most recent performance test).
- f. The individual HAP content of each coating, thinner, and cleanup material in pounds per gallon.
- g. The total uncontrolled individual HAP emission rate in tons (the sum of (b)x(g)x(0.0005 ton/lb).
- h. The total controlled individual HAP emission rate for all coatings and cleanup materials, in tons (i.e., calculated using the overall control efficiency from the most recent performance test).
- i. The rolling, 12-month summation of the data required in sections A.III.3.f. and A.III.3.i. above(i.e., the 12-month summations for individual HAP and total HAPs shall be calculated each month by adding the emission rate for the month to the emission rate for the previous 11 calendar months).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The quarterly summaries shall be submitted, i.e., by January 31, April 30, July 31, and

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October 31 of each year and shall cover the previous calendar quarters.

4. The permittee shall notify the Director (the Ohio EPA Southeast District Office) of any monthly record showing emissions in excess of the rolling, 12-month limitation specified in A.II. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation

20% opacity

Applicable Compliance Method

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.
 - b. Emission Limitation

10.85 lb/hr VOC (based on a daily average)

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.2. above.
 - c. Emission Limitation

45.34 TPY of VOC

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.2
 - d. Emission Limitation

90% destruction efficiency / 90% overall reduction of emissions

Applicable Compliance Method

Compliance shall be determined in accordance with 40 CFR 60 Appendix A, Method 25 or 25A, the procedures specified in OAC rule 3745-21-10 and the requirements found in Sections A.III and A.IV.

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

2. The emission testing shall be conducted as specified by the permittee's Title V permit.
3. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC and the capture efficiency and control efficiency limitations for VOC.
4. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Method 25 or 25A of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
5. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
6. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an

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"Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

a. Emission Limitation

Total facility individual HAP emission less than 10 TPY.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.3. above.

b. Emission Limitation

Total facility HAP's emissions less than 25 TPY.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.3

c. Emission Limitation

0.551 lb/hr of Particulate Matter

Applicable Compliance Method

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Compliance with the particulate matter emission limitation in Section A.I. of these terms and conditions shall be determined in accordance with the following method:

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$$E = \text{maximum coating solids usage rate (in pounds per hour)} * (1-TE) * (1-CE)$$

$$E = \text{particulate emissions rate (lb/hr)}$$

$$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.}$$

$$CE = \text{control efficiency of the control equipment (ie. booth filters)}$$

d. Emission Limitation

2.4 TPY of PM

Applicable Compliance Method

Compliance shall be based upon a one time calculation of potential as follows:

$$E = MHER * 8760 \text{ hr/yr} * 0.0005 \text{ Ton/lb} = \text{TPY}$$

Where

MHER is the maximum controlled hourly emission rate determined in section A.V

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section**I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R011 - Backline Finishing System (1 spray booth, and 1 UV drying oven controlled by a Regenerative Thermal Oxidizer) Administrative Modification of PTI 06-06474 issued on October 4, 2001 to the number of booths and ovens.	None	None

2. Additional Terms and Conditions**2.a** None**II. Operational Restrictions**

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

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V. Testing Requirements

None

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VI. Miscellaneous Requirements

None

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Emissions Unit ID: R013

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. 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	Applicable Rules/Requirements
R013 - Specialty Booth # 2 (1 spray booth controlled by a Regenerative Thermal Oxidizer)	OAC rule 3745-21-07(G)(1) OAC 3745-31-05(C) (Synthetic Minor to avoid MACT) OAC rule 3745-21-07(G)(6)(a) OAC rule 3745-17-07(A) OAC rule 3745-21-07(G)(2) OAC rule 3745-17-11(B) (Table 1) OAC rule 3745-31-05(A)(3)

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Emissions Unit ID: R013

Applicable Emissions
Limitations/Control
Measures

The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.1.2.a.

The emission reduction requirement specified in this rule (90% or more of the carbon in the organic material being incinerated) is less stringent to the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.1.2.a.

The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant OAC rule 3745-31-05(A)(3). See section A.1.2.a.

Volatile organic

compound (VOC) emissions shall not exceed 4.10 lbs/hr and 2.01 tons/yr.

See section A.1.2.a.

Compliance with this rule also includes compliance with OAC rules 3745-17-07(A) and 3745-17-11(B)

The total facility Hazardous Air Pollution (HAP) emissions shall be less than 10 tons per year of a individual HAP, and 25 tons per year of a total of HAPs.

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Particulate emissions shall not exceed 0.551 lb/hr.

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2. Additional Terms and Conditions

- 2.a** The facility shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a Regenerative Thermal Oxidizer (RTO) control efficiency (i.e., destruction or removal efficiency) which is at least 90%, by weight, for this emissions unit.

II. Operational Restrictions

1. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, 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.
2. The total facility Hazardous Air Pollution (HAP) emissions shall be less than 10 tons per year of a individual HAP, and 25 tons per year of a total of HAPs. The tons per year limits, shall be based upon a rolling twelve month period. The total facility limits are required to be federally enforceable in order to be exempt this facility from 40 CFR 63, Subpart JJ.
3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the following information each day for materials used in the emission unit.
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon, excluding water.
 - d. The total uncontrolled VOC emission rate in pounds (the sum of (b)x(c) for all coatings employed).
 - e. The total controlled VOC emission rate for all coatings and cleanup materials, in pounds (i.e., calculated using the overall control efficiency from the most recent performance test).
 - f. The hours of operation of the emissions unit.

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- g. The calculated average hourly emission rate in pounds per hour, based upon the total daily coatings employed and the actual hours of operation of the emission unit.
 - h. The total controlled VOC emissions from all coatings and cleanup materials employed year to date, in tons (i.e., calculated using the overall control efficiency from the most recent performance test).
3. The permittee shall collect and record the following information each month for materials used at the facility.
- a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The total HAP content of each coating, thinner, and cleanup material in pounds per gallon.
 - d. The total uncontrolled HAP emission rate in tons (the sum of (b)x(c)x(0.0005 ton/lb).
 - e. The total controlled HAP emission rate for all coatings and cleanup materials, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).
 - f. The individual HAP content of each coating, thinner, and cleanup material in pounds per gallon.
 - g. The total uncontrolled individual HAP emission rate in tons (the sum of (b)x(g)x(0.0005 ton/lb).
 - h. The total controlled individual HAP emission rate for all coatings and cleanup materials, in tons (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).
 - i. The rolling, 12-month summation of the data required in sections A.III.3.f. and A.III.3.i. above(i.e., the 12-month summations for individual HAP and total HAPs shall be calculated each month by adding the emission rate for the month to the emission rate for the previous 11 calendar months).

IV. Reporting Requirements

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1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The quarterly summaries shall be submitted, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
4. The permittee shall notify the Director (the Ohio EPA Southeast District Office) of any monthly record showing emissions in excess of the rolling, 12-month limitation specified in A.II. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation

20% opacity

Applicable Compliance Method

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.
 - b. Emission Limitation

4.10 lb/hr VOC (based on a daily average)

Applicable Compliance Method

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Compliance shall be based upon the monitoring and recordkeeping in Section A.III.2. above.

c. Emission Limitation

2.01 TPY of VOC

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.2

d. Emission Limitation

90% destruction efficiency / 90% overall reduction of emissions

Applicable Compliance Method

Compliance shall be determined in accordance with 40 CFR 60 Appendix A, Method 25 or 25A, the procedures specified in OAC rule 3745-21-10 and the requirements found in Sections A.III and A.IV.

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

2. The emission testing shall be conducted as specified by the permittee's Title V permit.
3. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC and the capture efficiency and control efficiency limitations for VOC.
4. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Method 25 or 25A of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
5. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
6. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an

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alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

a. Emission Limitation

Total facility individual HAP emission less than 10 TPY.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.3. above.

b. Emission Limitation

Total facility HAP's emissions less than 25 TPY.

Applicable Compliance Method

Compliance shall be based upon the monitoring and recordkeeping in Section A.III.3

c. Emission Limitation

0.551 lb/hr of Particulate Matter

Applicable Compliance Method

Compliance with the particulate matter emission limitation in Section A.I. of these terms and conditions shall be determined in accordance with the following method:

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$$E = \text{maximum coating solids usage rate (in pounds per hour)} * (1-TE) * (1-CE)$$

$$E = \text{particulate emissions rate (lb/hr)}$$

$$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.}$$

$$CE = \text{control efficiency of the control equipment (ie. booth filters)}$$

d. Emission Limitation

2.4 TPY of PM

Applicable Compliance Method

Compliance shall be based upon a one time calculation of potential as follows:

$$E = MHER * 8760 \text{ hr/yr} * 0.0005 \text{ Ton/lb} = \text{TPY}$$

Where

MHER is the maximum controlled hourly emission rate determined in section A.V

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VI. Miscellaneous Requirements

None

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Emissions Unit ID: R013

B. State Only Enforceable Section**I. 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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R013 - Specialty Booth # 2 (1 spray booth controlled by a Regenerative Thermal Oxidizer)	OAC rule 3745-31-05	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

98

Mills |

PTI A

Modification Issued: 8/2/2007

Emissions Unit ID: R013

None