

Facility ID: 0684020008 Issuance type: Title V Preliminary Proposed Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

- B005 - boiler #1;
- B006 - boiler #2;
- B007 - boiler #3;
- B008 - boiler #4;
- B009 - boiler #5;
- B010 - boiler #6;
- F001 - paved and unpaved roadways and parking areas;
- J001 - rail car loading facility;
- J002 - tank truck loading facility;
- J003 - loading of solvents from the carbon bed;
- P005 - sulfone storage bin and unloading;
- P012 - 1.51 mmBtu/hr multifuel fire water pump;
- P013 - 1.19 mmBtu/hr diesel fire water pump;
- P014 - arc welder (37 hp gasoline);
- P015 - arc welder (37 hp gasoline);
- P901 - plastic resins packaging facility;
- T001 - tank PC-501 (recovered monochlorobenzene);
- T004 - tank MC-104 Dowtherm tank (hot oil expansion);
- T005 - tank MC-880 solvent tank;
- T006 - tank MC-881 solvent tank;
- T007 - tank MC-882 solvent tank;
- T008 - tank MC-883 solvent tank;
- T009 - tank MC-884 solvent tank;
- T010 - tank MC-885 solvent tank;
- T011 - tank MC-890 solvent tank;
- T012 - tank MC-891 solvent tank;
- T013 - tank MC-892 solvent tank;
- T014 - tank MC-893 solvent tank;
- T015 - tank MC-911 solvent tank;
- T016 - tank MC-912 solvent tank;
- T017 - tank MC-913 solvent tank;
- T018 - tank MC-920 solvent tank;
- T019 - tank MC-930 solvent tank;
- T020 - tank PD-105 solvent tank;
- T021 - tank SF-536 solvent tank;
- T022 - tank PC-502 solvent tank;
- T023 - tank PD-133 solvent tank;
- T024 - tank PD-160 caustic soda tank;
- T025 - tank PC-151 methyl chloride tank;
- T026 - tank PD-135 dimethyl sulfoxide tank;
- T027 - tank PC-101 methyl chloride tank;
- T028 - tank PC-311 polymer solution tank;
- T029 - tank PC-313 polymer solution tank;
- T030 - tank PC-340 polymer solution blend tank;
- T031 - tank PC-609 solvent tank;
- T032 - tank PC-610 solvent tank;
- T033 - tank-PC-614 process tank;
- Z005 - Nauta blender;
- Z006 - sand blaster;

- Z007 - solvent parts cleaner;
- Z008 - injection molding machines;
- Z009 - lab ovens;
- Z010 - lab reactors; and
- Z011 - lab furnaces.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0684020008 Emissions Unit ID: B003 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
20 mmBtu/hr natural gas-fired hot oil heater	OAC rule 3745-31-05(A) (PTI 06-1420)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 and 3745-17-10.
	OAC rule 3745-17-07(A)	Particulate emissions shall not exceed 1 tpy. Visible particulate emissions from the hot oil heater shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions from the hot oil heater shall not exceed 0.020 pound per million Btu of actual heat input.

2. **Additional Terms and Conditions**
 - (a) None

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II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the actual hours of operation of this emissions unit.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation

occurs.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

0.020 pound of particulate emissions per million Btu of actual heat input

Applicable Compliance Method:

Divide the applicable AP-42, 5th Edition (supplement D issued 7/98) emission factor for filterable particulate matter from table 1.4-2 by the assumed heat content of natural gas (1020 Btu/cubic foot):

$$(1.9 \text{ lbs particulate emissions/million cubic feet}) \times (\text{cubic foot}/1020 \text{ Btu}) = 0.00186 \text{ lb particulate emissions/mmBtu}$$

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(9). No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
 - b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
 - c. Emission Limitation:

1 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following calculations:

Divide the applicable AP-42, 5th Edition (supplement D issued 7/98) emission factor for filterable particulate matter from table 1.4-2 by the assumed heat content of natural gas (1020 Btu/cubic foot):

$$(1.9 \text{ lbs particulate emissions/million cubic feet}) \times (\text{cubic foot}/1020 \text{ Btu}) = 0.00186 \text{ lb particulate emissions/million Btu}$$

$$0.00186 \text{ lb particulate emissions/million Btu} \times 20 \text{ mmBtu/hr} \times \text{actual hours of operation/yr} \times .0005 \text{ ton/lb} = \text{ton per year of particulate emissions.}$$

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020008 Emissions Unit ID: B003 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0684020008 Emissions Unit ID: P003 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Udel (polysulfone) unit (including two	OAC rule 3745-31-05	The requirements of this rule also include compliance

28,000-gallon storage tanks) controlled with parallel carbon adsorption beds (shared with emissions unit P010) and nine baghouses (PTI 06-3680 as modified August 7, 2001) with the requirements of OAC rule 3745-17-07 and 40 CFR Part 60, Subpart Kb.

Carbon adsorption bed VOC emissions from this emissions unit shall not exceed 106 tpy based on rolling, 12-month summations.

Fugitive VOC emissions from this emissions unit shall not exceed 107 tpy based on rolling, 12-month summations.

The permittee shall maintain a leak detection and repair program (LDRP) in accordance with permit to install (PTI) 06-3680 as modified August 7, 2001, or the most recent version approved by the company and the Ohio EPA, Southeast District Office (see A.III.7 below).

Total VOC emissions from this emissions unit shall not exceed 213 tpy based on rolling, 12-month summations.

Particulate emissions from all the stacks, including the baghouses, shall not exceed 1.5 lbs/hr and 6.6 tpy.

See A.I.2.c below.

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

See A.III.8 and A.III.9 below.

See A.I.2.a below.

See A.I.2.d and A.II.2 below.

OAC rule 3745-17-07(A)

40 CFR Part 60, Subpart Kb

OAC rule 3745-17-11

OAC rule 3745-21-07(G)(2)

2. Additional Terms and Conditions

- a. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- b. This emissions unit does not produce an organic chemical listed in Appendix A of OAC rule 3745-21-09 and, therefore, is not subject to OAC rule 3745-21-09(DD).
- c. All VOC emissions from this emissions unit, except the fugitive VOC emissions from process leaks, shall be vented to the carbon adsorption bed. All fugitive VOC emissions are from process leaks and are addressed by the Leak Detection and Repair Program.
- d. This emissions unit does not employ, apply, evaporate or dry any photochemically reactive material (PRM), or any substance containing such PRM. Therefore, there are no applicable emission limitations from OAC rule 3745-21-07(G)(2).

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II. Operational Restrictions

- 1. The parallel carbon adsorption beds shall be switched every 75 minutes of adsorption per the manufacturer's specifications or if the monochlorobenzene (MCB) analyzer reading is above 250 ppm for greater than 3 minutes.

Operation of the control equipment outside of the carbon adsorption bed switching requirements specified above may or may not indicate a mass emission violation. If required by the Ohio EPA, SEDO, compliance with the mass emission limitation shall be determined by performing mass emission tests, using USEPA-approved methods and procedures. The results of any required emission tests shall be used in determining whether or not the operation of the control equipment outside of the carbon adsorption bed switching requirements specified above is indicative of a possible violation of the mass emission limitation.

- 2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C) (5), in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall operate and maintain a continuous MCB analyzer and recorder which measures and records the carbon adsorption bed outlet MCB concentration when the emissions unit is in operation. Units shall be in ppm. The analyzing and recording devices shall be capable of accurately measuring the desired parameter. The MCB analyzer and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information each day:
 - a. a log of the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
 - b. the length of time between each carbon adsorption bed switch, in minutes; and
 - c. the duration, in minutes, of each MCB analyzer reading greater than 250 ppm. If the duration exceeds 3 minutes, the corrective action taken shall also be recorded.
3. For each day a photochemically reactive material is employed, the permittee shall maintain a record of the type and quantity of such materials employed in this emissions unit.
4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks and baghouse exhausts. The presence or absence of any visible emissions shall be noted in the operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the cause of the visible emissions;
 - c. the total duration of any visible emission incident; and
 - d. any corrective actions taken to eliminate the visible emissions.
5. The permittee shall collect and record the following information on a monthly basis:
 - a. total polysulfone produced by the emissions unit, in tons;
 - b. total methyl chloride added to the emissions unit, in tons;
 - c. the amount of fugitive methyl chloride from the emissions unit, in tons, determined using the commercially available software package called LEAKDAS or other equivalent program;
 - d. the amount of methyl chloride consumed in the reaction based on the polymer stoichiometry, in tons [i.e., (a) x 0.00283];
 - e. the amount of carbon adsorption bed methyl chloride emissions from the emissions unit, in tons [i.e., (b)-(c)-(d)];
 - f. the amount of monochlorobenzene added to the emissions unit, in tons;
 - g. the amount of fugitive monochlorobenzene from the emissions unit, in tons, determined using the commercially available software package called LEAKDAS or other equivalent program;
 - h. the amount of monochlorobenzene from the emissions unit recovered by the carbon adsorption bed system, in tons;
 - i. the amount of carbon adsorption bed monochlorobenzene emissions from the emissions unit, in tons [i.e., (f)-(g)-(h)];
 - j. the monthly carbon adsorption bed VOC emissions from the emissions unit, in tons [i.e., (e)+(i)];
 - k. the monthly fugitive VOC emissions from the emissions unit, in tons [i.e., (c)+(g)]; and
 - l. the monthly total VOC emissions from the emissions unit, in tons [i.e., (j)+(k)].
6. The permittee shall collect and record the following information on a monthly basis:
 - a. the rolling, 12-month summation of carbon adsorption bed VOC emissions from this emissions unit, in tons;
 - b. the rolling, 12-month summation of fugitive VOC emissions from this emissions unit, in tons; and
 - c. the rolling, 12-month summation of the total VOC emissions from this emissions unit, in tons.
7. The permittee shall maintain a leak detection and repair program (LDRP) in accordance with permit to install (PTI) 06-3680 or the most recent version approved by the company and the Ohio EPA, Southeast District Office. The LDRP emissions screening shall be done in accordance with the procedures set forth in 40 CFR Part 60, Appendix A, Method 21.
 - a. Except as otherwise provided in the approved plan, equipment shall be monitored for leaks as follows:
 - i. The permittee shall perform monthly visual inspections and annual emissions screening of all non-exempt pumps and agitators in light liquid service (LLS) or heavy liquid service (HLS).
 - ii. The permittee shall perform quarterly emissions screening of all non-exempt valves, compressors, and pressure relief devices in gas/vapor service and all non-exempt open-ended lines in LLS, HLS, or gas/vapor service. The monitoring period for valves in gas/vapor service can be changed to one of the methods below if the percent of valves leaking is less than 2. If the percent of valves leaking becomes greater than 2, then quarterly monitoring must be resumed. Ohio EPA shall be notified prior to implementing an alternative monitoring schedule.
 - (a) After two consecutive quarterly monitoring periods in which the percent of valves leaking was less than 2, the monitoring frequency can be changed to skip the first quarter of every two consecutive

quarters.

- (b) After five consecutive quarterly monitoring periods in which the percent of valves leaking was less than 2, the monitoring frequency can be changed to skip the first three quarters of every four consecutive quarters.

iii. The permittee shall perform annual emissions screening of all non-exempt valves and pressure relief devices in LLS or HLS. Ten percent (10%) of all non-exempt flanges and connectors in gas/vapor, LLS, or HLS shall be screened annually.

iv. All sources shall be screened within five days after a repair has been made.

- b. The emission screening values shall be recorded and maintained in an appropriate data management system. The information to be recorded shall include the following:

- i. the date;
- ii. the detector;
- iii. the source identification (tag #, excluding connectors);
- iv. the screening value;
- v. the source type;
- vi. the service (gas/vapor, light liquid, heavy liquid);
- vii. the comments;
- viii. the exemptions (if any); and
- ix. the location.

- c. A leak is defined as a screening value that exceeds 10,000 ppmv or a visible/audible emission of gases or liquids from the sealing surfaces of equipment in VOC service. Upon detection of a leak, the permittee shall take the following steps:

- i. a weatherproof identification tag shall be attached to the leaking equipment;
- ii. a record of the leak and any attempt to repair it shall be entered into the leak repair log; and
- iii. a work order for repairs shall be placed the day the leak is detected if the initial attempt at repair is not successful.

The identification tag attached to the leaking equipment can be removed once the leak has been repaired.

- d. Leaking equipment shall be repaired within 15 days after the leak was detected. Leaking equipment is considered repaired if the corrected screening value taken after the repair attempt is less than 10,000 ppmv.

A record of the repair attempts shall be entered into the leak repair log or data management system.

After each repair attempt, the leaking equipment shall be rescreened to check effectiveness. The rescreening value shall be recorded in the leak repair log and/or data management system.

i. A first attempt to repair leaking equipment shall be made as soon as practicable, but no later than 5 days from the date the leak was detected. First attempts at repair can include the following:

- (a) tightening of bonnet bolts;
- (b) replacement of bonnet bolts;
- (c) tightening of packing gland nuts; and/or
- (d) injection of lubricant into lubricated packing.
 - ii. A delay of repair is permissible if one of the following conditions applies:
 - (a) the repair of the leaking equipment would require a process unit shutdown;
 - (b) the leaking equipment is isolated from the process and is purged; and/or
 - (c) the repair of the leaking source would result in more emissions than would occur by a delay of repair.

The repair shall be completed during the next process unit shutdown. A delay of repair may extend beyond the shutdown if delivery of repair parts will be after the planned startup date of the process unit.

- e. The following information shall be kept in a log at a readily accessible location:

- i. a list of the identification numbers for all the equipment subject to the monitoring program;
- ii. the screening values from previous monitoring of the sources;
- iii. a list of identification numbers for equipment designated for no detectable emissions;
- iv. a list of identification numbers for equipment tied into closed vent systems;

- v. compliance tests for equipment designated for no detectable leaks which will include the following information:
- (a) the date of the compliance test;
 - (b) the background level measured during the compliance test;
 - (c) the maximum screening measurement for the equipment during the compliance test;
- vi. a list of identification numbers for equipment designated as difficult or unsafe to monitor with an explanation why it is difficult or unsafe to monitor (includes the equipment which is covered by insulation); and
- vii. information regarding valves which are subject to an alternate monitoring schedule which shall include:
- (a) a list of identification numbers for valves which are subject to an alternate monitoring schedule based on a skip period, showing a schedule for monitoring and the percent of leaking valves for each monitoring period; and
 - (b) a list of identification numbers for valves which were designated difficult to monitor, with an explanation why it is difficult to monitor, and the monitoring schedule for these valves.
8. The permittee shall maintain readily accessible records showing the dimensions of the two 28,000-gallon tanks and an analysis showing the capacity of the vessels. These records shall be kept for the life of the emissions unit.
9. The permittee shall maintain a record of the volatile organic liquid (VOL) stored in the two 28,000-gallon tanks, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. Records shall be retained for a minimum of two years.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods during which use of an individual carbon adsorption bed exceeded 75 minutes and/or use of an individual bed continued for greater than 3 minutes while the MCB analyzer reading was greater than 250 ppm.
2. The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the Ohio EPA Southeast District Office) within 30 days of the deviation.
3. The permittee shall submit semiannual written reports that (a) identify all weeks during which any visible particulate emissions were observed from the stacks and/or baghouse exhausts serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Southeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit quarterly deviation (excursion) reports to the Director (the Ohio EPA Southeast District Office) that identify the following, based upon the monthly record keeping:
 - a. each exceedance of the rolling, 12-month carbon adsorption bed VOC emission limit;
 - b. each exceedance of the rolling, 12-month fugitive VOC emission limit; and
 - c. each exceedance of the rolling, 12-month total VOC emission limit.
5. The permittee shall submit semiannual LDRP reports in accordance with the most recent approved plan. These reports shall be submitted to the Director (the Ohio EPA Southeast District Office) by February 1 and August 1 of each year and shall cover the previous 6-month period. The reports shall include the following:
 - a. the process unit identification;
 - b. the number of pumps in light liquid service excluding those exempt from monitoring based on no detectable emissions or use of an approved barrier fluid seal system;
 - c. the number of valves in gas/vapor service as well as the number of those valves exempt based on no detectable emissions, the number of those subject to an alternative monitoring schedule, and the number of remaining valves which are subject to the normal monitoring schedule;
 - d. for each quarter during the semiannual period:
 - i. the number of pumps in light liquid service in which leaks were detected;
 - ii. the number of pumps in light liquid service in which leaks were not repaired within 15 days from the date detected;
 - iii. the number of valves in gas/vapor or light liquid service in which leaks were detected;
 - iv. the number of valves in gas/vapor or light liquid service in which leaks were not repaired within 15 days from the date detected;
 - v. an explanation for those leaking sources which had a delay of repair;
 - e. the dates that the process unit was shutdown during that semiannual period;

- f. the number of additions and deletions of sources made to the process unit during that semiannual period; and
- g. the list of valves which have been added to an alternative monitoring schedule during the semiannual period.

These reports also shall include the calculations of the fugitive methyl chloride and fugitive monochlorobenzene emissions from this emissions unit for each calendar month.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:
 - 106 tpy of carbon adsorption bed VOC emissions, based on rolling, 12-month summations
 - 107 tpy of fugitive VOC emissions, based on rolling, 12-month summations
 - 213 tpy of total VOC emissions, based on rolling, 12-month summations
 Applicable Compliance Method:

Compliance with the rolling, 12-month summation limitation for carbon adsorption bed VOCs shall be demonstrated based upon the record keeping required in sections A.III.5 and A.III.6.

Compliance with the rolling, 12-month summation limitation for fugitive VOCs shall be demonstrated based upon the record keeping required in sections A.III.5 and A.III.6.

Compliance with the rolling, 12-month summation limitation for total VOCs shall be demonstrated based upon the record keeping required in sections A.III.5 and A.III.6.
 - b. Emission Limitation:
 - 20% opacity as a 6-minute average
 Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - c. Emission Limitation:
 - 1.5 lbs/hr and 6.6 tpy of particulate emissions
 Applicable Compliance Method:

Compliance with the annual limitation shall be demonstrated by the permittee as follows:

$$1.5 \text{ lbs of particulates/hr} \times \text{actual hours of operation/yr} \times 0.0005 \text{ ton/lb} = \text{tpy of particulates}$$

For the hourly emission limitation, emission tests may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020008 Emissions Unit ID: P003 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020008 Issuance type: Title V Preliminary Proposed Permit

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Facility ID: 0684020008 Emissions Unit ID: P007 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
plastic resins compounding line A controlled with a baghouse	OAC rule 3745-31-05 (PTI 06-4832)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07. 0.12 lb/hr of particulate emissions 0.53 tpy of particulate emissions
	OAC rule 3745-17-07	0.50 lb/hr of volatile organic compounds (VOC) 2.19 tpy of VOC Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	See A.I.2.b and A.II.2 below.
2. Additional Terms and Conditions		
a.	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
b.	This emissions unit does not employ, apply, evaporate or dry any photochemically reactive material (PRM), or any substance containing such PRM. Therefore, there are no applicable emission limitations from OAC rule 3745-21-07(G)(2).	

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, SEDO, compliance with the mass emission limitation and visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitation.
2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the amount of radel produced, in pounds;
 - b. the amount of udel produced, in pounds;
 - c. the total hours of polymer production;
 - d. the overall average hourly polymer production rate for the month, in lbs/hr; and
 - e. the average hourly VOC emission rate, in lb/hr, determined using the following calculation:

$$\frac{[(\text{radel produced} \times \text{radel emission factor of } 0.0009 \text{ lb VOC per lb radel produced}) + (\text{udel produced} \times \text{udel emission factor of } 0.00025 \text{ lb VOC per lb udel produced})]}{\text{total hours of polymer production}}$$
2. The permittee shall collect and record the following information each year for this emissions unit:
 - a. the annual production rate for each product type, in tons per year;
 - b. the total production rate, in tons per year;
 - c. the annual VOC emissions for each product type, in tons per year, obtained by multiplying the annual production rate from section A.III.2.a by the associated VOC emission factor (radel = 0.0009, udel = 0.00025) to obtain the VOC emissions in tpy; and
 - d. the total annual VOC emissions, in tons per year, obtained by summing the annual VOC emissions for each product type.
3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s) with any modifications deemed necessary by the permittee. The permittee shall record the pressure drop across the baghouse on a weekly basis.

4. For each day a photochemically reactive material is employed, the permittee shall maintain a record of the type and quantity of such materials employed in this emissions unit.

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the hourly VOC emission limitation.
3. The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the Ohio EPA Southeast District Office) within 30 days of the deviation.

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V. **Testing Requirements**

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

0.12 lb/hr of particulate emissions

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the hourly production rate in section A.III.1.d by the B.P. Amoco emission factor of .006 pound per pound of product and by .01 (99% control efficiency of the baghouse) to obtain the particulate emissions in lbs/hr.

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
 - b. Emission Limitation:

0.53 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the total production rate, in tpy, in section A.III.2.b by the B.P. Amoco emission factor of .006 pound per pound of product and by .01 (99% control efficiency of the baghouse) to obtain the particulate emissions in tpy.
 - c. Emission Limitation:

0.50 lb/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping specified in section A.III.1.e.

If required, the following test method shall be employed to demonstrate compliance with the allowable mass emission rate for VOC: Method 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.
 - d. Emission Limitation:

2.19 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping specified in section A.III.2.d.
 - e. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-

17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020008 Emissions Unit ID: P007 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020008 Emissions Unit ID: P008 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
plastic resins compounding line B controlled with a baghouse	OAC rule 3745-31-05 (PTI 06-4832)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07. 0.12 lb/hr of particulate emissions 0.53 tpy of particulate emissions
	OAC rule 3745-17-07	0.50 lb/hr of volatile organic compounds (VOC) 2.19 tpy of VOC Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	See A.I.2.b and A.II.2 below.

2. Additional Terms and Conditions

- a. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- b. This emissions unit does not employ, apply, evaporate or dry any photochemically reactive material (PRM), or any substance containing such PRM. Therefore, there are no applicable emission limitations from OAC rule 3745-21-07(G)(2).

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, SEDO, compliance with the mass emission limitation and visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitation.
2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the amount of radel produced, in pounds;
 - b. the amount of udel produced, in pounds;
 - c. the total hours of polymer production;

- d. the overall average hourly polymer production rate for the month, in lb/hr; and
 - e. the average hourly VOC emission rate, in lb/hr, determined using the following calculation:

$$\frac{[(\text{radel produced} \times \text{radel emission factor of } 0.0009 \text{ lb VOC per lb radel produced}) + (\text{udel produced} \times \text{udel emission factor of } 0.00025 \text{ lb VOC per lb udel produced})]}{\text{total hours of polymer production}}$$
2. The permittee shall collect and record the following information each year for this emissions unit:
 - a. the annual production rate for each product type, in tons per year;
 - b. the total production rate, in tons per year;
 - c. the annual VOC emissions for each product type, in tons per year, obtained by multiplying the annual production rate from section A.III.2.a by the associated VOC emission factor (radel = 0.0009, udel = 0.00025) to obtain the VOC emissions in tpy; and
 - d. the total annual VOC emissions, in tons per year, obtained by summing the annual VOC emissions for each product type.
3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s) with any modifications deemed necessary by the permittee. The permittee shall record the pressure drop across the baghouse on a weekly basis.
4. For each day a photochemically reactive material is employed, the permittee shall maintain a record of the type and quantity of such materials employed in this emissions unit.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the hourly VOC emission limitation.
3. The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the Ohio EPA Southeast District Office) within 30 days of the deviation.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

0.12 lb/hr of particulate emissions

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the hourly production rate in section A.III.1.d by the B.P. Amoco emission factor of .006 pound per pound of product and by .01 (99% control efficiency of the baghouse) to obtain the particulate emissions in lbs/hr.

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
 - b. Emission Limitation:

0.53 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the total production rate, in tpy, in section A.III.2.b by the B.P. Amoco emission factor of .006 pound per pound of product and by .01 (99% control efficiency of the baghouse) to obtain the particulate emissions in tpy.
 - c. Emission Limitation:

0.50 lb/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping specified in section A.III.1.e.

If required, the following test method shall be employed to demonstrate compliance with the allowable mass emission rate for VOC: Method 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

d. Emission Limitation:

2.19 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping specified in section A.III.2.d.

e. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020008 Emissions Unit ID: P008 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020008 Emissions Unit ID: P010 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<p>multipurpose polymers unit (including a 20,000-gallon surge tank) controlled with parallel carbon adsorption beds (shared with emissions unit P003) and nine baghouses</p>	<p>OAC rule 3745-31-05 (PTI 06-4127 as modified April 13, 2001)</p>	<p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 and 40 CFR Part 60, Subpart Kb.</p> <p>Carbon adsorption bed VOC emissions from this emissions unit shall not exceed 74.6 tpy based on rolling, 12-month summations.</p> <p>Fugitive VOC emissions from this emissions unit shall not exceed 58.5 tpy based on rolling, 12-month summations.</p> <p>The permittee shall maintain a leak detection and repair program (LDRP) in accordance with permit to install (PTI) 06-4127 as modified April 13, 2001, or the most recent version approved by the company and the Ohio EPA, Southeast District Office (see A.III.7 below).</p> <p>Total VOC emissions from this emissions unit shall not exceed 133.1 tpy based on rolling, 12-month summations.</p> <p>Particulate emissions from all the stacks, including the baghouses, shall not exceed 0.25 lb/hr and 1 tpy.</p> <p>See A.I.2.c below.</p> <p>Visible particulate emissions from any stack shall not</p>
	<p>OAC rule 3745-17-07(A)</p>	

- | | | |
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| | | exceed 20% opacity as a 6-minute average, except as provided by the rule. |
| | 40 CFR Part 60, Subpart Kb | See A.III.8, A.III.9, and A.IV.6 below. |
| | OAC rule 3745-17-11 | See A.I.2.a below. |
| | OAC rule 3745-21-07(G)(2) | See A.I.2.d and A.II.2 below. |
2. **Additional Terms and Conditions**
- The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
 - This emissions unit does not produce an organic chemical listed in Appendix A of OAC rule 3745-21-09 and, therefore, is not subject to OAC rule 3745-21-09(DD).
 - All VOC emissions from this emissions unit, except the fugitive VOC emissions from process leaks, shall be vented to the carbon adsorption bed. All fugitive VOC emissions are from process leaks and are addressed by the Leak Detection and Repair Program.
 - This emissions unit does not employ, apply, evaporate or dry any photochemically reactive material (PRM), or any substance containing such PRM. Therefore, there are no applicable emission limitations from OAC rule 3745-21-07(G)(2).

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II. **Operational Restrictions**

- The parallel carbon adsorption beds shall be switched every 75 minutes of adsorption per the manufacturer's specifications or if the monochlorobenzene (MCB) analyzer reading is above 250 ppm for greater than 3 minutes.

Operation of the control equipment outside of the carbon adsorption bed switching requirements specified above may or may not indicate a mass emission violation. If required by the Ohio EPA, SEDO, compliance with the mass emission limitation shall be determined by performing mass emission tests, using USEPA-approved methods and procedures. The results of any required emission tests shall be used in determining whether or not the operation of the control equipment outside of the carbon adsorption bed switching requirements specified above is indicative of a possible violation of the mass emission limitation.
- The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

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III. **Monitoring and/or Record Keeping Requirements**

- The permittee shall operate and maintain a continuous MCB analyzer and recorder which measures and records the carbon adsorption bed outlet MCB concentration when the emissions unit is in operation. Units shall be in ppm. The analyzing and recording devices shall be capable of accurately measuring the desired parameter. The MCB analyzer and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals with any modifications deemed necessary by the permittee.
- The permittee shall collect and record the following information each day:
 - a log of the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
 - the length of time between each carbon adsorption bed switch, in minutes; and
 - the duration, in minutes, of each MCB analyzer reading greater than 250 ppm. If the duration exceeds 3 minutes, the corrective action taken shall also be recorded.
- For each day a photochemically reactive material is employed, the permittee shall maintain a record of the type and quantity of such materials employed in this emissions unit.
- The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks and baghouse exhausts. The presence or absence of any visible emissions shall be noted in the operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - the location and color of the emissions;
 - the cause of the visible emissions;
 - the total duration of any visible emission incident; and
 - any corrective actions taken to eliminate the visible emissions.
- The permittee shall collect and record the following information on a monthly basis:
 - total polysulfone produced by the emissions unit, in tons;
 - total methyl chloride added to the emissions unit, in tons;

- c. the amount of fugitive methyl chloride from the emissions unit, in tons, determined using the commercially available software package called LEAKDAS or other equivalent program;
 - d. the amount of methyl chloride consumed in the reaction based on the polymer stoichiometry, in tons [i.e., (a) x 0.00283];
 - e. the amount of carbon adsorption bed methyl chloride emissions from the emissions unit, in tons [i.e., (b)-(c)-(d)];
 - f. the amount of monochlorobenzene added to the emissions unit, in tons;
 - g. the amount of fugitive monochlorobenzene from the emissions unit, in tons, determined using the commercially available software package called LEAKDAS or other equivalent program;
 - h. the amount of monochlorobenzene from the emissions unit recovered by the carbon adsorption bed system, in tons;
 - i. the amount of carbon adsorption bed monochlorobenzene emissions from the emissions unit, in tons [i.e., (f)-(g)-(h)];
 - j. the monthly carbon adsorption bed VOC emissions from the emissions unit, in tons [i.e., (e)+(i)];
 - k. the monthly fugitive VOC emissions from the emissions unit, in tons [i.e., (c)+(g)]; and
 - l. the monthly total VOC emissions from the emissions unit, in tons [i.e., (j)+(k)].
6. The permittee shall collect and record the following information on a monthly basis:
 - a. the rolling, 12-month summation of carbon adsorption bed VOC emissions from this emissions unit, in tons;
 - b. the rolling, 12-month summation of fugitive VOC emissions from this emissions unit, in tons; and
 - c. the rolling, 12-month summation of the total VOC emissions from this emissions unit, in tons.
7. The permittee shall maintain a leak detection and repair program (LDRP) in accordance with permit to install (PTI) 06-4127 or the most recent version approved by the company and the Ohio EPA, Southeast District Office. The LDRP emissions screening shall be done in accordance with the procedures set forth in 40 CFR Part 60, Appendix A, Method 21.
 - a. Except as otherwise provided in the approved plan, equipment shall be monitored for leaks as follows:
 - i. The permittee shall perform monthly visual inspections and annual emissions screening of all non-exempt pumps and agitators in light liquid service (LLS) or heavy liquid service (HLS).
 - ii. The permittee shall perform quarterly emissions screening of all non-exempt valves, compressors, and pressure relief devices in gas/vapor service and all non-exempt open-ended lines in LLS, HLS, or gas/vapor service. The monitoring period for valves in gas/vapor service can be changed to one of the methods below if the percent of valves leaking is less than 2. If the percent of valves leaking becomes greater than 2, then quarterly monitoring must be resumed. Ohio EPA shall be notified prior to implementing an alternative monitoring schedule.
 - (a) After two consecutive quarterly monitoring periods in which the percent of valves leaking was less than 2, the monitoring frequency can be changed to skip the first quarter of every two consecutive quarters.
 - (b) After five consecutive quarterly monitoring periods in which the percent of valves leaking was less than 2, the monitoring frequency can be changed to skip the first three quarters of every four consecutive quarters.
 - iii. The permittee shall perform annual emissions screening of all non-exempt valves and pressure relief devices in LLS or HLS. Ten percent (10%) of all non-exempt flanges and connectors in gas/vapor, LLS, or HLS shall be screened annually.
 - iv. All sources shall be screened within five days after a repair has been made.
 - b. The emission screening values shall be recorded and maintained in an appropriate data management system. The information to be recorded shall include the following:
 - i. the date;
 - ii. the detector;
 - iii. the source identification (tag #, excluding connectors);
 - iv. the screening value;
 - v. the source type;
 - vi. the service (gas/vapor, light liquid, heavy liquid);
 - vii. the comments;
 - viii. the exemptions (if any); and
 - ix. the location.
 - c. A leak is defined as a screening value that exceeds 10,000 ppmv or a visible/audible emission of gases or liquids from the sealing surfaces of equipment in VOC service. Upon detection of a leak, the permittee shall take the following steps:
 - i. a weatherproof identification tag shall be attached to the leaking equipment;

- ii. a record of the leak and any attempt to repair it shall be entered into the leak repair log; and
 - iii. a work order for repairs shall be placed the day the leak is detected if the initial attempt at repair is not successful.
- The identification tag attached to the leaking equipment can be removed once the leak has been repaired.
- d. Leaking equipment shall be repaired within 15 days after the leak was detected. Leaking equipment is considered repaired if the corrected screening value taken after the repair attempt is less than 10,000 ppmv.
 - A record of the repair attempts shall be entered into the leak repair log or data management system.
 - After each repair attempt, the leaking equipment shall be rescreened to check effectiveness. The rescreening value shall be recorded in the leak repair log and/or data management system.
 - i. A first attempt to repair leaking equipment shall be made as soon as practicable, but no later than 5 days from the date the leak was detected. First attempts at repair can include the following:
 - (a) tightening of bonnet bolts;
 - (b) replacement of bonnet bolts;
 - (c) tightening of packing gland nuts; and/or
 - (d) injection of lubricant into lubricated packing.
 - ii. A delay of repair is permissible if one of the following conditions applies:
 - (a) the repair of the leaking equipment would require a process unit shutdown;
 - (b) the leaking equipment is isolated from the process and is purged; and/or
 - (c) the repair of the leaking source would result in more emissions than would occur by a delay of repair.
 - The repair shall be completed during the next process unit shutdown. A delay of repair may extend beyond the shutdown if delivery of repair parts will be after the planned startup date of the process unit.
 - e. The following information shall be kept in a log at a readily accessible location:
 - i. a list of the identification numbers for all the equipment subject to the monitoring program;
 - ii. the screening values from previous monitoring of the sources;
 - iii. a list of identification numbers for equipment designated for no detectable emissions;
 - iv. a list of identification numbers for equipment tied into closed vent systems;
 - v. compliance tests for equipment designated for no detectable leaks which will include the following information:
 - a. the date of the compliance test;
 - b. the background level measured during the compliance test;
 - c. the maximum screening measurement for the equipment during the compliance test;
 - vi. a list of identification numbers for equipment designated as difficult or unsafe to monitor with an explanation why it is difficult or unsafe to monitor (includes the equipment which is covered by insulation); and
 - vii. information regarding valves which are subject to an alternate monitoring schedule which shall include:
 - a. a list of identification numbers for valves which are subject to an alternate monitoring schedule based on a skip period, showing a schedule for monitoring and the percent of leaking valves for each monitoring period; and
 - b. a list of identification numbers for valves which were designated difficult to monitor, with an explanation why it is difficult to monitor, and the monitoring schedule for these valves.
 - 8. The permittee shall maintain readily accessible records showing the dimensions of the surge tank and an analysis showing the capacity of the vessel. These records shall be kept for the life of the emissions unit.
 - 9. The permittee shall maintain a record of the volatile organic liquid (VOL) stored in the surge tank, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. Records shall be retained for a minimum of two years.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods during which use of an individual carbon adsorption bed exceeded 75 minutes and/or use of an individual bed continued for greater than 3 minutes while the MCB analyzer reading was greater than 250 ppm.
2. The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the Ohio EPA Southeast District Office) within 30 days of the deviation.
3. The permittee shall submit semiannual written reports that (a) identify all weeks during which any visible particulate emissions were observed from the stacks and/or baghouse exhausts serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Southeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit quarterly deviation (excursion) reports to the Director (the Ohio EPA Southeast District Office) that identify the following, based upon the monthly record keeping:
 - a. each exceedance of the rolling, 12-month carbon adsorption bed VOC emission limit;
 - b. each exceedance of the rolling, 12-month fugitive VOC emission limit; and
 - c. each exceedance of the rolling, 12-month total VOC emission limit.
5. The permittee shall submit semiannual LDRP reports in accordance with the most recent approved plan. These reports shall be submitted to the Director (the Ohio EPA Southeast District Office) by February 1 and August 1 of each year and shall cover the previous 6-month period. The reports shall include the following:
 - a. the process unit identification;
 - b. the number of pumps in light liquid service excluding those exempt from monitoring based on no detectable emissions or use of an approved barrier fluid seal system;
 - c. the number of valves in gas/vapor service as well as the number of those valves exempt based on no detectable emissions, the number of those subject to an alternative monitoring schedule, and the number of remaining valves which are subject to the normal monitoring schedule;
 - d. for each quarter during the semiannual period:
 - i. the number of pumps in light liquid service in which leaks were detected;
 - ii. the number of pumps in light liquid service in which leaks were not repaired within 15 days from the date detected;
 - iii. the number of valves in gas/vapor or light liquid service in which leaks were detected;
 - iv. the number of valves in gas/vapor or light liquid service in which leaks were not repaired within 15 days from the date detected;
 - v. an explanation for those leaking sources which had a delay of repair;
 - e. the dates that the process unit was shutdown during that semiannual period;
 - f. the number of additions and deletions of sources made to the process unit during that semiannual period; and
 - g. the list of valves which have been added to an alternative monitoring schedule during the semiannual period.

These reports also shall include the calculations of the fugitive methyl chloride and fugitive monochlorobenzene emissions from this emissions unit for each calendar month.
6. In accordance with 40 CFR Part 60.116b(d), the permittee shall notify the Ohio EPA Southeast District Office within 30 days when the maximum true vapor pressure of the liquid in the 20,000-gallon surge tank exceeds 27.6 kPa (4.00 psia).

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:
 - 74.6 tpy of carbon adsorption bed VOC emissions, based on rolling, 12-month summations
 - 58.5 tpy of fugitive VOC emissions, based on rolling, 12-month summations
 - 133.1 tpy of total VOC emissions, based on rolling, 12-month summations

Applicable Compliance Method:

 - Compliance with the rolling, 12-month summation limitation for carbon adsorption bed VOCs shall be demonstrated based upon the record keeping specified in sections A.III.5 and A.III.6.
 - Compliance with the rolling, 12-month summation limitation for fugitive VOCs shall be demonstrated

based upon the record keeping specified in sections A.III.5 and A.III.6.

Compliance with the rolling, 12-month summation limitation for total VOCs shall be demonstrated based upon the record keeping specified in sections A.III.5 and A.III.6.

b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

0.25 lb/hr and 1 tpy of particulate emissions

Applicable Compliance Method:

Compliance with the annual limitation shall be demonstrated by the permittee as follows:

$0.25 \text{ lb of particulates/hr} \times \text{actual hours of operation/yr} \times 0.0005 \text{ ton/lb} = \text{tpy of particulates}$

For the hourly emission limitation, emission tests may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020008 Emissions Unit ID: P010 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0684020008 Emissions Unit ID: P011 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
plastic resins compounding line H controlled with a baghouse	OAC rule 3745-31-05 (PTI 06-4832)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07. 0.12 lb/hr of particulate emissions 0.53 tpy of particulate emissions
	OAC rule 3745-17-07	0.50 lb/hr of volatile organic compounds (VOC) 2.19 tpy of VOC Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	See A.I.2.b and A.II.2 below.

2. Additional Terms and Conditions

- a. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- b. This emissions unit does not employ, apply, evaporate or dry any photochemically reactive material (PRM), or any substance containing such PRM. Therefore, there are no applicable emission limitations from OAC rule 3745-21-07(G)(2).

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

The operation of the control equipment outside the range specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Ohio EPA, SEDO, compliance with the mass emission limitation and visible emission limitation shall be determined by performing concurrent mass emission tests and visible emissions readings, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission readings shall be used in determining whether or not the operation of the control equipment outside the range specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitation.
2. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C) (5), in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the amount of radel produced, in pounds;
 - b. the amount of udel produced, in pounds;
 - c. the total hours of polymer production;
 - d. the overall average hourly polymer production rate for the month, in lb/hr; and
 - e. the average hourly VOC emission rate, in lb/hr, determined using the following calculation:

$$\frac{[(\text{radel produced} \times \text{radel emission factor of } 0.0009 \text{ lb VOC per lb radel produced}) + (\text{udel produced} \times \text{udel emission factor of } 0.00025 \text{ lb VOC per lb udel produced})]}{\text{total hours of polymer production}}$$
2. The permittee shall collect and record the following information each year for this emissions unit:
 - a. the annual production rate for each product type, in tons per year;
 - b. the total production rate, in tons per year;
 - c. the annual VOC emissions for each product type, in tons per year, obtained by multiplying the annual production rate from section A.III.2.a by the associated VOC emission factor (radel = 0.0009, udel = 0.00025) to obtain the VOC emissions in tpy; and
 - d. the total annual VOC emissions, in tons per year, obtained by summing the annual VOC emissions for each product type.
3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s) with any modifications deemed necessary by the permittee. The permittee shall record the pressure drop across the baghouse on a weekly basis.
4. For each day a photochemically reactive material is employed, the permittee shall maintain a record of the type and quantity of such materials employed in this emissions unit.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the hourly VOC emission limitation.
3. The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the Ohio EPA Southeast District Office) within 30 days of the deviation.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

0.12 lb/hr of particulate emissions

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the hourly production rate in section A.III.1.d by the B.P. Amoco emission factor of .006 pound per pound of product and by .01 (99% control efficiency of the baghouse) to obtain the particulate emissions in lbs/hr.

Emission tests also may be required in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

b. Emission Limitation:

0.53 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the total production rate, in tpy, in section A.III.2.b by the B.P. Amoco emission factor of .006 pound per pound of product and by .01 (99% control efficiency of the baghouse) to obtain the particulate emissions in tpy.

c. Emission Limitation:

0.50 lb/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping specified in section A.III.1.e.

If required, the following test method shall be employed to demonstrate compliance with the allowable mass emission rate for VOC: Method 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

d. Emission Limitation:

2.19 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping specified in section A.III.2.d.

e. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020008 Emissions Unit ID: P011 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020008 Emissions Unit ID: P017 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
107 HP gasoline fired portable water pump FG225A	OAC rule 3745-31-05(A) (PTI 06-4780)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 and 3745-17-11.

2.3 lbs/hr of volatile organic compounds (VOC)

46.9 lbs/hr of carbon monoxide (CO)

1.2 lbs/hr of nitrogen oxides (NOx)

See A.II.2 below.

OAC rule 3745-31-05(D)
(PTI 06-4780)

OAC rule 3745-17-07(A)

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

OAC rule 3745-17-11(B)(5)(a)

Particulate emissions shall not exceed 0.25 pound per million Btu actual heat input.

See A.I.2.a below.

OAC rule 3745-17-11(B)(5)(a)

Particulate emissions shall not exceed 0.310 pound per million Btu actual heat input.

See A.I.2.b below.

2. Additional Terms and Conditions

- a. The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.310 lb/mmBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- b. This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.

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II. Operational Restrictions

- 1. The permittee shall burn only gasoline as fuel in this emissions unit.
- 2. The maximum annual operating hours for this emissions unit shall not exceed 600 hours, based upon a rolling, 12 month summation of the operating hours.

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III. Monitoring and/or Record Keeping Requirements

- 1. For each day during which the permittee burns a fuel other than gasoline, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- 2. The permittee shall maintain monthly records of the operating hours for this emissions unit.

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IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than gasoline was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- 2. The deviation reports shall be submitted in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.
- 3. The permittee shall submit annual reports of the total hours of operation for this emissions unit. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

- 1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Particulate emissions shall not exceed 0.25 lb/mmBtu actual heat input.

Applicable Compliance Method:

The permittee cannot demonstrate compliance with this emission limitation based upon the current emission factor contained in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96). The Ohio EPA revised the emission limitation specified in this rule citation based upon the currently applicable emission factor. The revised rule was adopted by the Director of Ohio EPA in December of 1997, and it will be submitted to the U.S. EPA as a proposed revision to the Ohio SIP for particulate matter. When the SIP revision is approved by

the U.S. EPA, the 0.25 lb/mmBtu actual heat input emission limitation will no longer be applicable, and the permittee will be able to demonstrate compliance with the new emission limitation (0.310 lb/mmBtu actual heat input) using the current emission factor.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

Particulate emissions shall not exceed 0.310 lb/mmBtu actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.31 lb/mmBtu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

c. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

d. Emission Limitation:

2.3 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the maximum fuel input of the engine (107 hp-hr/hr X 7,000 Btu/hp-hr X .000001 mmBtu/Btu = 0.749 mmBtu fuel input/hr). Then multiplying the AP-42 total hydrocarbon emission factor from Table 3.3-1 (10/96) of 3.03 lb/mmBtu X 0.749 mmBtu fuel input/hr gives 2.3 lbs/hr.

e. Emission Limitation:

46.9 lbs/hr of CO

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the maximum fuel input of the engine (107 hp-hr/hr X 7,000 Btu/hp-hr X .000001 mmBtu/Btu = 0.749 mmBtu fuel input/hr). Then multiplying the AP-42 CO emission factor from Table 3.3-1 (10/96) of 62.7 lb/mmBtu X 0.749 mmBtu fuel input/hr gives 46.9 lbs/hr.

f. Emission Limitation:

1.2 lbs/hr of NOx

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the maximum fuel input of the engine (107 hp-hr/hr X 7,000 Btu/hp-hr X .000001 mmBtu/Btu = 0.749 mmBtu fuel input/hr). Then multiplying the AP-42 NOx emission factor from Table 3.3-1 (10/96) of 1.63 lb/mmBtu X 0.749 mmBtu fuel input/hr gives 1.2 lbs/hr.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020008 Emissions Unit ID: P017 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0684020008 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0684020008 Emissions Unit ID: P019 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
wastewater operations	none	none

See A.I.2.a below.

2. **Additional Terms and Conditions**

- a. Pursuant to the provisions of OAC rule 3745-21-07(A)(1) and OAC rule 3745-15-01(O), this emissions unit is an "existing source" which is not located in a "Priority 1" county as indicated in paragraph (A) of OAC rule 3745-21-06. The provisions of OAC rule 3745-21-07(G), therefore, do not apply.

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0684020008 Emissions Unit ID: P019 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Applicable Emissions Limitations/Control

Operations, Property, and/or Equipment Applicable Rules/Requirements Measures

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0684020008 Emissions Unit ID: P020 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
110 HP diesel air compressor	OAC rule 3745-31-05 (PTI 06-6146)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 and 3745-17-11. Particulate emissions shall not exceed .310 lb/mmBtu actual heat input. 0.84 tpy of particulate emissions 0.23 lb/hr of sulfur dioxide (SO2) 0.99 tpy of SO2

	0.33 lb/hr of volatile organic compounds (VOC) 1.43 tpy of VOC
	0.73 lb/hr of carbon monoxide (CO) 3.22 tpy of CO
	3.4 lbs/hr of nitrogen oxides (NOx) 14.87 tpy of NOx
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-11(B)(5)(a)	Particulate emissions shall not exceed .25 lb/mmBtu actual heat input. See A.I.2.a below.
OAC rule 3745-17-11(B)(5)(a)	Particulate emissions shall not exceed .310 lb/mmBtu actual heat input. See A.I.2.b below.

2. Additional Terms and Conditions

- a. The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.310 lb/mmBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- b. This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.

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II. Operational Restrictions

- 1. The permittee shall burn only diesel fuel in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

- 1. For each day during which the permittee burns a fuel other than diesel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than diesel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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V. Testing Requirements

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

a. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.25 lb/mmBtu actual heat input.

Applicable Compliance Method:

The permittee cannot demonstrate compliance with this emission limitation based upon the current emission factor contained in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96). The Ohio EPA revised the emission limitation specified in this rule citation based upon the currently applicable emission factor. The revised rule was adopted by the Director of Ohio EPA in December of 1997, and it will be submitted to the U.S. EPA as a proposed revision to the Ohio SIP for particulate matter. When the SIP revision is approved by the U.S. EPA, the 0.25 lb/mmBtu actual heat input emission limitation will no longer be applicable, and the permittee will be able to demonstrate compliance with the new emission limitation (0.310 lb/mmBtu

actual heat input) using the current emission factor.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

c. Emission Limitation:

Particulate emissions shall not exceed 0.310 lb/mmBtu actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.31 lb/mmBtu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

0.84 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equation:

$0.310 \text{ lb/mmBtu} \times 0.617 \text{ mmBtu/hr} \times \text{actual hours of operation/yr} \times 0.0005 \text{ ton/lb} = \text{ton per year of particulates.}$

e. Emission Limitation:

0.23 lb/hr of SO₂

Applicable Compliance Method:

Compliance shall be demonstrated based upon a one time calculation of the potential to emit as described in the following equation:

$$E = EF \times HP = \text{lb/hr}$$

$$E = 2.05 \text{ E-3 lb/hp-hr} \times 110 \text{ hp} = 0.23 \text{ lb/hr}$$

where:

EF = the AP-42, Table 3.3-1 emission factor in lb/horsepower-hour;

HP = the horsepower of the emissions unit; and

E = the hourly emissions.

If required the following test method shall be employed to demonstrate compliance with the allowable mass emission rate for SO₂, Method 6 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

f. Emission Limitation:

1 tpy of SO₂

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equation:

$$0.23 \text{ lb/hr} \times \text{actual hours of operation/yr} \times 0.0005 \text{ ton/lb} = \text{tons per year of SO}_2.$$

g. Emission Limitation:

0.33 lb/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon a one time calculation of the potential to emit as described in the following equation:

$$E = EF \times HP = \text{lb/hr}$$

$$E = 2.99 \text{ E-3 lb/hp-hr} \times 110 \text{ hp} = 0.33 \text{ lb/hr}$$

where:

EF = the AP-42, Table 3.3-1 emission factor in lb/horsepower-hour;

HP = the horsepower of the source; and

E = the hourly emissions.

If required the following test method shall be employed to demonstrate compliance with the allowable mass emission rate for VOC, Method 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

h. Emission Limitation:

1.43 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equation:

$0.33 \text{ lb/hr} \times \text{actual hours of operation/yr} \times 0.0005 \text{ ton/lb} = \text{tons per year of VOC.}$

i. Emission Limitation:

0.73 lb/hr of CO

Applicable Compliance Method:

Compliance shall be demonstrated based upon a one time calculation of the potential to emit as described in the following equation:

$E = EF \times HP = \text{lb/hr}$

$E = 6.68 \text{ E-3 lb/hp-hr} \times 110 \text{ hp} = 0.73 \text{ lb/hr}$

where:

EF = the AP-42, Table 3.3-1 emission factor in lb/horsepower-hour;

HP = the horsepower of the emissions unit; and

E = the hourly emissions.

If required the following test method shall be employed to demonstrate compliance with the allowable mass emission rate for CO, Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

j. Emission Limitation:

3.22 tpy of CO

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equation:

$0.73 \text{ lb/hr} \times \text{actual hours of operation/yr} \times 0.0005 \text{ ton/lb} = \text{tons per year of CO.}$

k. Emission Limitation:

3.4 lbs/hr of NO_x

Applicable Compliance Method:

Compliance shall be demonstrated based upon a one time calculation of the potential to emit as described in the following equation:

$E = EF \times HP = \text{lb/hr}$

$E = 0.031 \text{ lb/hp-hr} \times 110 \text{ hp} = 3.4 \text{ lbs/hr}$

where:

EF = the AP-42, Table 3.3-1 emission factor in lb/horsepower-hour;

HP = the horsepower of the emissions unit; and

E = the hourly emissions.

If required the following test method shall be employed to demonstrate compliance with the allowable mass emission rate for NO_x, Method 7 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

l. Emission Limitation:

14.87 tpy of NO_x

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following equation:

$3.4 \text{ lbs/hr} \times \text{actual hours of operation/yr} \times 0.0005 \text{ ton/lb} = \text{tons per year of NO}_x.$

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0684020008 Emissions Unit ID: P020 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None