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

3/9/2011

Certified Mail

Facility ID: 1431150801
Permit Number: P0099308
County: Hamilton

Mark Ferguson
Formica Corporation - Evendale Operations
10155 Reading Rd.
Evendale, OH 45241

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 5/27/2010. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Hamilton County Dept. of Environmental Services

# Response to Comments

Response to comments for: Title V Permit

| | |
|---|---|
| Facility ID: | 1431150801 |
| Facility Name: | Formica Corporation - Evendale Operations |
| Facility Description: | Manufacturer of laminate |
| Facility Address: | 10155 Reading Rd.<br>Evendale, OH 45241<br>Hamilton County |
| Permit #: | P0099308, Renewal |
| A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Cincinnati Enquirer on 06/04/2010. The comment period ended on 07/04/2010. | |
| Hearing date (if held) | |
| Hearing Public Notice Date (if different from draft public notice) | |

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

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

1. Topic: There were no written comments received on the Draft Title V Permit. The changes made from the draft to the PPP were based on a meeting with the company and stepping through the Draft Title V.

Ohio | Environmental Protection Agency

# PRELIMINARY PROPOSED

# Division of Air Pollution Control
# Title V Permit
for
Formica Corporation - Evendale Operations

| | |
|---|---|
| Facility ID: | 1431150801 |
| Permit Number: | P0099308 |
| Permit Type: | Renewal |
| Issued: | 3/9/2011 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Title V Permit**
for
Formica Corporation - Evendale Operations

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# Authorization

Facility ID: 1431150801
Facility Description: Manufacturer of laminate
Application Number(s): A0031006, A0031007, A0031008
Permit Number: P0099308
Permit Description: Renewal Title V for a formica manufacturing operation, which includes, one wood waste boiler, several continuous paper web operations, several trimming and sanding operations, several natural gas and number 2 fuel oil boilers; several storage tanks both resin and fuel, back-up emergency generators, resin mixing operations, several sheet compound operations, abrasive blasting operations, vinyl film application.
Permit Type: Renewal
Issue Date: 3/9/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0099307

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Formica Corporation - Evendale Operations
10155 Reading Rd.
Evendale, OH 45241

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

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Hamilton County Dept. of Environmental Services. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

# A. Standard Terms and Conditions

## 1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

*(Authority for term: ORC 3704.036(A))*

## *2.* Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or

local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide

Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Hamilton County Dept. of Environmental Services.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**3. Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**4. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

**5. Title IV Provisions**

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

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**6. Severability Clause**

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

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**7. General Requirements**

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the

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

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
*(Authority for term: OAC rule 3745-77-07(B))*

**13. Compliance Requirements**

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
*(Authority for term: OAC rule 3745-77-07(G))*

**17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

**18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. Air Pollution Nuisance**

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

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

**25. Records Retention Requirements Under State Law Only**

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

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting**

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

**28. Permit Transfers**

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

*(Authority for term: OAC rule 3745-77-01(C))*

**29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

# B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

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

| | |
|---|---|
| F001 | Wood waste storage silo |
| F002 | Bottom ash handling from the wood waste boiler |
| F003 | Paved Roadways and Parking Areas |
| K009 | 18 Inch research and development treater. |
| P008 | Scrap shredding and conveying |
| P031 | Cut of Saw |
| P034 | Press  Plate Buffer |
| P035 | Press Plate Buffer |
| P037 | Resin Mixing and Storage |
| P038 | Non production woodworking machinery for marketing purposes |
| P042 | Press Plate Cleaning |
| P050 | Resin Mixing and Storage |
| P051 | Artificial marble manufacturing |
| P052 | Custom sheet cut line SCMI #1 |
| P053 | Custom sheet  ut line SCMI #2 |
| P054 | Press Plate Cleaning |
| P055 | Press Plate Cleaning |
| T001 | Thinned Phenolic Resin Storage Tank-6, 000 gallon fixed roof storage tank |
| B008 | Less than 10 MMBtu/hr Natural Gas fired heater |
| B009 | Less than 10 MMBtu/hr Natural Gas fired heater |
| B010 | Less than 10 MMBtu/hr Natural Gas fired heater |
| B011 | Less than 10 MMBtu/hr Natural Gas fired heater |
| P078 | Back-up emergency generator #1 |
| P079 | Back-up emergency generator #1 |
| T002 | Resin Storage Tank-12,000 gallon fixed roof storage tank |
| T003 | Resin Storage Tank-12,000 gallon fixed roof storage tank |
| T004 | Isopropyl alcohol storage tank-12,000 gallon fixed roof storage tank |
| T005 | Methanol storage tank-12,000 gallon fixed roof storage tank |
| T006 | #2 oil storage tank-110,000 gallon fixed roof storage tank |
| P080 | Press Plate Cleaning |
| T007 | Thinned Phenolic Resin Storage-2,000 gallon fixed roof storage tank |
| T008 | Thinned Phenolic Resin Storage Tank-50,000 gallon fixed roof storage tank |
| P081 | Research and development of product formulations |
| T009 | Thinned Phenolic Resin Storage Tank-50,000 gallon fixed roof storage tank |
| T010 | Thinned Phenolic Resin Storage Tank-12,000 gallon fixed roof storage tank |
| P082 | Warehouse Saw |
| P083 | #2 Divide Saw |
| T009 | Melamine storage tank 1-4,000 gallon fixed roof storage tank |
| T010 | Melamine storage tank 1-4,000 gallon fixed roof storage tank |
| T011 | Melamine storage tank 1-4,000 gallon fixed roof storage tank |
| T012 | Melamine storage tank 1-4,000 gallon fixed roof storage tank |
| T013 | Melamine storage tank 1-4,000 gallon fixed roof storage tank |

| | |
|---|---|
| T014 | Blend Tank 1-1,500 gallon fixed roof storage tank |
| T015 | Blend Tank 2-1,500 gallon fixed roof storage tank |
| T016 | Blend Tank 3-1,500 gallon fixed roof storage tank |
| T017 | Blend Tank 4-1,500 gallon fixed roof storage tank |
| T018 | Blend Tank 5-1,500 gallon fixed roof storage tank |
| T019 | Blend Tank 6-1,500 gallon fixed roof storage tank |
| P084 | Resin Filter |
| T020 | Weigh Tank 1-880 gallons |
| T021 | Weigh Tank 1-880 gallons |
| T022 | Thinned Resin Storage-3,670 gallon fixed roof storage tank |
| T023 | Thinned Resin Storage-3,670 gallon fixed roof storage tank |
| P085 | Cleaning Solution mixing |
| P086 | Indy Saw 1-Cut Product Sheets |
| P087 | Indy Saw 2 Cut Product Sheets |
| P088 | Vinyl film application to product bundles |
| P089 | Piskataway Saw |
| P090 | Auto Inspection machine |
| P091 | Skilsaw #1 |
| P092 | Skilsaw #2 |
| P093 | Skilsaw #3 |
| P094 | Abrasive Blasting of Press Plates |
| P095 | Abrasive Blasting of Press Plates |
| P096 | Non-halogenated cold cleaner |
| P097 | Saw and sander dust handling |
| P098 | Steam Press #20 |
| P099 | Steam Press #22 |
| P100 | Steam Press #24 |
| P101 | Steam Press #26 |
| P102 | Steam Press #28 |

Each insignificant emissions unit at this facility must comply with all applicable Ohio EPA and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

# C. Emissions Unit Terms and Conditions

## 1. B004, Boiler DSI-4

**Operations, Property and/or Equipment Description:**

28.7 MMBtu/hr wood waste-fired boiler controlled with a baghouse

a) 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) d)(3) and d)(4).

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 14-05714)<br><br>Netting determination for NOx, CO, and PM10 was developed under PTI 14-05714 to avoid PSD review. | Particulate emissions (PE) and Particulate matter 10 microns and less (PM10) shall not exceed 0.10 lb PE/PM10 per MMBtu and 12.57 TPY PE/PM10.*<br><br>Sulfur dioxide (SO2) emissions shall not exceed 0.01 lb SO2/MMBtu and 1.25 TPY.*<br><br>Carbon monoxide (CO) emissions shall not exceed 0.30 lb CO/MMBtu and 37.7 TPY.*<br><br>Nitrogen oxide (NOx) emissions shall not exceed 0.604 lb NOx/MMBtu and 75.9 TPY NOx.*<br><br>Volatile organic compound (VOC) emissions shall not exceed 0.039 lb VOC/MMBtu and 4.9 TPY VOC.*<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and 40 CFR Part 60 Subpart Dc.<br><br>See b)(2)(a), c)(1), and c)(2).<br><br>*The lb/MMBtu and ton per year emission limitations are based upon the emissions |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | unit's potential to emit. Therefore, no records are required to demonstrate compliance with these emission limits. |
| b. | OAC rule 3745-17-07(A)(1) | Visible particulate emissions shall not exceed 20% as a 6-minute average, except as specified by rule. |
| d. | OAC rule 3745-17-10 | The PE limitation specified in OAC rule 3745-17-10(C) is less stringent than that established in PTI 14-05714 pursuant to OAC rule 3745-31-05(A)(3). |
| e. | 40 CFR Part 60 Subpart Dc | The SO2, PE, and visible emission limitations specified in 40 CFR Part 60 Subpart Dc do not apply because this emissions unit has a maximum rated heat input capacity of less than 30 MMBtu/hr and is restricted to burning only wood. |

(2) Additional Terms and Conditions

a. The emissions from emissions unit B004 shall be vented to a multiclone and baghouse in series.

c) Operational Restrictions

(1) The pressure drop across the baghouse shall be maintained within the range of 2.0 - 10.0 inches of water while the emissions unit is in operation.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(A)(1))

(2) The permittee shall only burn wood waste in this emissions unit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records listing days when a fuel other than wood waste was burned. For each day during which the permittee burns a fuel other than wood waste, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. 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.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(3) The permit to install for this emissions unit B004 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hydrogen Chloride

TLV (mg/m3): 2200

Maximum Hourly Emission Rate (lbs/hr): .545

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2.6

MAGLC (ug/m3): 52.4

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

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

provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3)]

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05714: d)(1)-d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;

d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05714: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

0.10 lb of PE/PM10/MMBtu of actual heat input; and

12.57 TPY of PE/PM10.

Applicable compliance method for PE/PM10:

Compliance with the 0.10 lb of PE/PM10/MMBtu emission limitation was demonstrated through emission testing performed for this emissions unit on 4/26/2006. The results of the emission test indicated an emission rate of 0.02 lb of PE/PM10/MMBtu of actual heat input. See f)(1)(f) for additional testing requirements for PE/PM10.

Compliance with the annual emission limitation shall be calculated by multiplying the stack test result (lb/MMBTU) by the heat input capacity of the emissions unit (MMBtu/hr) and by the actual hours of operation per year, and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

b. Emission Limitations:

0.604 lb of NOx/MMBtu of actual heat input; and

75.9 TPY of NOx.

Applicable compliance method for NOx:

Compliance with the 0.604 lb of NOx/MMBtu emission limitation was demonstrated through emission testing performed for this emissions unit on 4/26/2006. The results of the emission test indicated an emission rate of 0.460 lb of NOx/MMBtu of actual heat input. If additional testing is required, compliance

with the allowable mass emission rate for NOx shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

Compliance with the annual emission limitation shall be calculated by multiplying the stack test result (lb/MMBTU) by the heat input capacity of the emissions unit (MMBtu/hr) and by the actual hours of operation per year, and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

c. Emission Limitations:

0.30 lb of CO/MMBtu of actual heat input; and

37.7 TPY of CO.

Applicable compliance method for CO:

Compliance with the 0.30 lb of CO/MMBtu emission limitation was demonstrated through emission testing performed for this emissions unit on 12/18/2001. The results of the emission test indicated an emission rate of 0.158 lb of CO/MMBtu of actual heat input. If additional testing is required, compliance with the allowable mass emission rate for CO shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

Compliance with the annual emission limitation shall be calculated by multiplying the stack test result (lb/MMBTU) by the heat input capacity of the emissions unit (MMBtu/hr) and by the actual hours of operation per year, and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

d. Emission Limitations:

0.01 lb of SO2/MMBtu of actual heat input; and

1.25 TPY of SO2.

Applicable compliance method for SO2:

Compliance with the lb/MMBtu emission limitation may be based on the manufacturer's guaranteed emission factor of 0.01 lb of SO2/MMBtu of actual heat input as specified in permit to install application 14-05714. If required, compliance with the lb/MMBtu emission limitation for SO2 shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

Compliance with the annual emission limitation shall be calculated by multiplying the emission factor of 0.01 lb of SO2/MMBtu of actual heat input by the heat input capacity of the emissions unit (MMBtu/hr) and by the actual hours of operation per year, and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

e. Emission Limitations:

0.039 lb of VOC/MMBtu of actual heat input; and

4.9 TPY of VOC.

Applicable compliance method for VOC:

Compliance with the lb/MMBtu emission limitation may be demonstrated using the emissions factor from Table 1.6-1 in Compilation of Emissions Factors, AP-42, September 2003 of 0.039 lb VOC/MMBtu of actual heat input.

If required, compliance with the lb/MMBtu emission limitation for VOC shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

Compliance with the annual emission limitation shall be calculated by multiplying the emission factor of 0.039 lb VOC/MMBtu of actual heat input by the derated heat input capacity of the emissions unit (MMBtu/hr) and by the actual hours of operation per year, and dividing by 2000 lbs/ton.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

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

The emission testing shall be conducted within 6 months of permit expiration.

The emission testing shall be conducted to demonstrate compliance with the lb/MMBtu emission limitations for PE/PM-10.

The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for PE/PM-10, 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission tests.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit

and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

g. Emission Limitation:

Visible particulate emissions shall not exceed 20% as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05714: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) See PTI 14-05714 for the netting demonstration to avoid PSD review for PE/PM10, NOx, and CO.

## 2. K006, Treater 106

**Operations, Property and/or Equipment Description:**

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(D)<br>(PTI 14-04511) | The total combined VOC emissions from emissions units K006 and K014 shall not exceed 98.9 tons per year based on a rolling 12-month summation. |
| b. | OAC rule 3745-21-09(F) | The VOC content of the coatings employed shall not exceed 2.9 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents. |
| c. | 40 CFR Part 63, Subpart JJJJ National Emission Standard for Hazardous Air Pollutants: Paper and other Web Coating<br>(40 CFR 63.3280 – 63.3420)<br><br>In accordance with 40 CFR 63.3300, this emissions unit is a web coating line at an existing facility that is a major source of HAP subject to the emissions limitations / control measures specified in this section. | As specified in 40 CFR 63.3320(b)(2), Organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) for each month.<br><br>See b)(2)a. |
| d. | 40 CFR 63.1-15<br>(40 CFR 63.3340) | See b)(2)b. |

(2) Additional Terms and Conditions

a. This emissions unit is subject to the requirements of 40 CFR Part 63 Subpart JJJJ -National Emissions Standards for Hazardous Air Pollutants for Paper and other Web Coating. The permittee shall comply with the applicable emission limitations and operational restrictions specified in 40 CFR Part 63.3280 – 63.3420. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal

Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District Office or local air agency.

b. As specified in 40 CFR 63.3340, Table 2 to 40 CFR Part 63, Subpart JJJJ - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ, shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

a. the name and identification number of each coating, as applied; and

b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

where:

$D_C$ = the density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

$V_S$ = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

$W_{VM}$ = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_W$ = weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$ = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(f), and OAC rule 3745-21-10(B)(8)).

(2) The permittee shall collect and record the organic HAP content, recorded in kg of organic HAP/kg of coating material, for each coating employed during the month. The organic HAP content shall be determined by the methods specified in 40 CFR Part 63.3370(b).

Currently, the permittee has chosen to demonstrate compliance with the HAP content restrictions by the use of “as-purchased” compliant coating materials (40 CFR

63.3370(a)(1)). Should the permittee choose another compliance option as provided for in 63.3370(a)(2)-63.3370(a)(6), the permittee shall collect and record the information specified in 63.3370(a)(2)-63.3370(a)(6) and 63.3410(a) to demonstrate ongoing compliance.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.3370(a)(1)(i), 63.3370(b), and 63.3410(a)(1)(vi))

(3) The permittee shall collect and record the following information for this emissions unit on a monthly basis:

a. the name and identification number of each coating and cleanup material employed;

b. the VOC content of each coating and cleanup material, as applied;

c. the number of gallons of each coating and cleanup material employed; and

d. the total VOC emissions from all coatings and cleanup materials employed (the summation of d)(3)b X d)(3)c, in pounds or tons.

e. the total amount of natural gas combusted in the curing oven and the total VOC emissions from the combustion of natural gas in the curing oven (the total amount of natural gas burned per month in cubic feet X 1000 Btu/cubic foot of natural gas X 0.0058 lb VOC/MMBtu*); and

*emission factor taken from AP 42, Fifth Edition, 1/95, Section 1.4 Natural Gas Combustion

f. the total VOC emissions from this emissions unit, d)(3)(d) + d)(3)(e).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

(4) The permittee shall collect and record the following information on a monthly basis:

a. the combined total VOC emissions from all coatings, cleanup materials employed in emissions units K006 and K014 (the summation of the values from d)(3)f and d)(3)f for emissions units K006 and K014, respectively), in tons; and

b. the total combined rolling, 12-month summation of the VOC emissions for emissions units K006 and K014 (the current monthly total VOC emissions added to the total VOC emissions for the previous 11 months), in tons.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-04511: d)(1)-d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(Authority for term: OAC rule 3745-77-07(C)(1)and OAC rule 3745-21-09(B)(3)(g))

(2) The permittee shall submit semi-annual compliance reports in accordance with 40 CFR Part 63.3400(c) by January 31 and July 31 of each year covering the previous six calendar months of operation. The semi-annual compliance reports shall contain the following information as specified in 40 CFR Part 63.3400(c)(2):

a. company name and address;

b. statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report;

c. the date of the report and beginning and ending dates of the reporting period;

d. if there are no deviations from the organic HAP emission limitations as specified in b)(2), a statement that there were no deviations from the emissions limitations during the reporting period; and,

e. if there were any deviations from the organic HAP emission limitations as specified in b)(2). during the reporting period, the report shall include the following information:

i. the total operating time of each affected source during the reporting period; and,

ii. information on the number, duration, and cause of the deviations (including unknown cause), if applicable, and the corrective action taken.

In addition to the above, the semi-annual compliance report shall include additional information if the following changes occur at the facility: 1) a change occurs at the facility or within the process that might affect its compliance status; 2) a change from what was reported in the Initial Notification of Compliance Status occurs at the facility or within the process; or 3) a change to another emission limitation option under 40 CFR Part 63, Subpart JJJJ.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63.3400(c)

(3) The permittee shall submit quarterly deviation (excursion) reports for any monthly record documenting an exceedance of the total combined rolling, 12-month emission limitation for VOC from emissions units K006 and K014.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-04511: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. VOC Content Limitation:

The VOC content of the coatings employed shall not exceed 2.9 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

If required, USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-21-10(B))

b. Organic HAP Emission Limitation:

Organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) for each month.

Applicable Compliance Method:

Compliance with the applicable organic HAP emission limitation shall be demonstrated by the methods listed in c)(1) and the record keeping requirements in d)(2).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63.3360(c))

c. Emission Limitation:

The total combined VOC emissions from emissions units K006 and K014 shall not exceed 98.9 tons per year based on a rolling 12-month summation.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(4).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-04511: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

**3. K013, Treater 99**

**Operations, Property and/or Equipment Description:**

Melamine resin paper treater line (Treater 99)

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 14-04281) | The volatile organic compound (VOC) shall not exceed 234 lbs/hr from coatings* and 38.77 tons/yr.<br><br>The formaldehyde emissions shall not exceed 4.73 lbs/hr*.<br><br>See b)(2)c.<br><br>*The lbs/hr VOC and formaldehyde emission limitations were based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(PP). |
| b. | OAC rule 3745-21-09(PP) | The VOC content of the coatings employed shall not exceed 0.9 pound of VOC per gallon of coating, as applied, excluding water and exempt solvents. |
| c. | 40 CFR Part 63, Subpart JJJJ National Emission Standard for Hazardous Air Pollutants: Paper and other Web Coating<br>(40 CFR 63.3280 – 63.3420) | As specified in 40 CFR 63.3320(b)(2), Organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg of organic HAP per kg coating material) for each month. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | In accordance with 40 CFR 63.3300, this emissions unit is a web coating line at an existing facility that is a major source of HAP subject to the emissions limitations / control measures specified in this section. | See b)(2)a. |
| d. | 40 CFR 63.1-15<br>(40 CFR 63.3340) | See b)(2)b. |

(2) Additional Terms and Conditions

a. This emissions unit is subject to the requirements of 40 CFR Part 63 Subpart JJJJ -National Emissions Standards for Hazardous Air Pollutants for Paper and other Web Coating. The permittee shall comply with the applicable emission limitations and operational restrictions specified in 40 CFR Part 63.3280 – 63.3420. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District Office or local air agency.

b. As specified in 40 CFR 63.3340, Table 2 to 40 CFR Part 63, Subpart JJJJ - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ, shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

c. The curing oven emissions shall not exceed the following:

0.0006 lb of SO2/MMBtu, 0.02 TPY of SO2*;

0.021 lb of CO/MMBtu, 0.6 TPY of CO*;

0.10 lb of NOx/MMBtu, 2.8 TPY of NOx*;

0.0058 lb of VOC/MMBtu*;

0.012 lb of PM/PM10/MMBtu and 0.33 TPY of PM/PM10*.

*The lb/MMBtu and TPY emission limitations for emissions from the curing oven were based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

a. the name and identification number of each coating, as applied; and

b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

where:

$D_C$ = the density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

$V_S$ = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

$W_{VM}$ = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_W$ = weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$ = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(f), and OAC rule 3745-21-10(B)(8)).

(2) The permittee shall collect and record the organic HAP content, recorded in kg of organic HAP/kg of coating material, for each coating employed during the month. The organic HAP content shall be determined by the methods specified in 40 CFR Part 63.3370(b).

Currently, the permittee has chosen to demonstrate compliance with the HAP content restrictions by the use of “as-purchased” compliant coating materials (40 CFR 63.3370(a)(1)). Should the permittee choose another compliance option as provided for in 63.3370(a)(2)-63.3370(a)(6), the permittee shall collect and record the information specified in 63.3370(a)(2)-63.3370(a)(6) and 63.3410(a) to demonstrate ongoing compliance.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.3370(a)(1)(i), 63.3370(b), and 63.3410(a)(1)(vi))

(3) The permittee shall collect and record the following information for this emissions unit on a monthly basis:

a. the name and identification number of each coating and cleanup material employed;

b. the VOC content of each coating and cleanup material, as applied;

c. the number of gallons of each coating and cleanup material employed;

d. the total VOC emissions from all coatings and cleanup materials employed (the summation of d)(3)b. X d)(3)c., in pounds or tons;

e. the total amount of natural gas combusted in the curing oven and the total VOC emissions from the combustion of natural gas in the curing oven (the total amount of natural gas burned per month in cubic feet X 1000 Btu/cubic foot of natural gas X 0.0058 lb VOC/MMBtu*); and

*emission factor taken from AP 42, Fifth Edition, 1/95, Section 1.4 Natural Gas Combustion

f. the total VOC emissions from this emissions unit, d)(3)d. + d)(3)e.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-04281: d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(Authority for term: OAC rule 3745-77-07(C)(1)and OAC rule 3745-21-09(B)(3)(g))

(2) The permittee shall submit semi-annual compliance reports in accordance with 40 CFR Part 63.3400(c) by January 31 and July 31 of each year covering the previous six calendar months of operation. The semi-annual compliance reports shall contain the following information as specified in 40 CFR Part 63.3400(c)(2):

a. company name and address;

b. statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report;

c. the date of the report and beginning and ending dates of the reporting period;

d. if there are no deviations from the organic HAP emission limitations as specified in b)(2), a statement that there were no deviations from the emissions limitations during the reporting period; and,

e. if there were any deviations from the organic HAP emission limitations as specified in b)(2). during the reporting period, the report shall include the following information:

i. the total operating time of each affected source during the reporting period; and,

ii. information on the number, duration, and cause of the deviations (including unknown cause), if applicable, and the corrective action taken.

In addition to the above, the semi-annual compliance report shall include additional information if the following changes occur at the facility: 1) a change occurs at the facility or within the process that might affect its compliance status; 2) a change from what was reported in the Initial Notification of Compliance Status occurs at the facility or within the process; or 3) a change to another emission limitation option under 40 CFR Part 63, Subpart JJJJ.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63.3400(c))

(3) The permittee shall submit quarterly deviation (excursion) reports for any monthly record documenting an exceedance of the rolling, 12-month emission limitation for VOC of 38.77 TPY.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-04281: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. VOC Content Limitation:

The VOC content of the coatings employed shall not exceed 0.9 pound of VOC per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

If required, USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the

USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-21-10(B))

b. Organic HAP Emission Limitation:

Organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg of organic HAP per kg coating material) for each month.

Applicable Compliance Method:

Compliance with the applicable organic HAP emission limitation shall be demonstrated by the methods listed in c)(1) and the record keeping requirements in d)(2).

(Authority for term: OAC rule 3745-77-07(C)(1), and 40 CFR Part 63.3360(c))

c. Emission Limitation:

38.77 tons per year based on a rolling 12-month summation.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(3)f.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitations:

The curing oven emissions shall not exceed the following:

0.0006 lb of SO2/MMBtu, 0.02 TPY of SO2*;

0.021 lb of CO/MMBtu, 0.6 TPY of CO*

0.10 lb of NOx/MMBtu, 2.8 TPY of NOx*

0.0058 lb of VOC/MMBtu*;

0.012 lb of PM/PM10/MMBtu and 0.33 TPY of PM/PM10*.

<u>Applicable Compliance Method:</u>

The lb/MMBtu and TPY emission limitations from the curing oven were established using worst case operating scenarios and the appropriate emission factors from AP 42, Fifth Edition, 1/95, Section 1.4, Natural Gas Combustion. The detailed emission calculations can be found in PTI 14-04281.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

Emission Limitations:

234 lbs of VOC/hr from coatings*; and

4.73 lbs of formaldehyde/hr.

The lbs/hr VOC and formaldehyde/hr emission limitations were established using worst case operating scenarios and VOC/formaldehyde contents. The detailed emission calculations can be found in PTI 14-04281.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-04281:f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

None.

## 4. K014, Treater 109

**Operations, Property and/or Equipment Description:**

Phenolic resin paper coating line

a) 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)

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(D)<br>(PTI 14-04511)<br><br>Netting determination for VOC was developed under PTI 14-04511 to avoid PSD review. | The volatile organic compound (VOC) emissions shall not exceed 31.5 TPY of VOC from K014 based on a rolling 12-month summation.<br><br>The total combined VOC emissions from emissions units K006 and K014 shall not exceed 98.9 tons per year based on a rolling 12-month summation. |
| b. | OAC rule 3745-31-05(A)(3)<br>(PTI 14-04511) | The VOC emissions shall not exceed 11.0 lbs/hr from coatings applied.<br><br>The formaldehyde shall not exceed 0.225 lb/hr.<br><br>See b)(2)c.-b)(2)f.<br><br>The requirements of this rule also include compliance with OAC rule 3745-31-05(D). |
| c. | OAC rule 3745-21-09(F) | The emission limitations/control requirements specified in this rule are the same as or less stringent than those established pursuant to OAC rule 3745-31-05(A)(3). |
| d. | 40 CFR Part 63, Subpart JJJJ National Emission Standard for Hazardous Air Pollutants: Paper and other Web Coating<br>(40 CFR 63.3280 – 63.3420) | As specified in 40 CFR 63.3320(b)(2), Organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) for each month. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | In accordance with 40 CFR 63.3300, this emissions unit is a web coating line at an existing facility that is a major source of HAP subject to the emissions limitations / control measures specified in this section. | See b)(2)a. |
| e. | 40 CFR 63.1-15<br>(40 CFR 63.3340) | See b)(2)b. |
| f. | 40 CFR Part 64 Compliance Assurance Monitoring (CAM) | (d)(5) - d)(17). |

(2) Additional Terms and Conditions

a. This emissions unit is subject to the requirements of 40 CFR Part 63 Subpart JJJJ -National Emissions Standards for Hazardous Air Pollutants for Paper and other Web Coating. The permittee shall comply with the applicable emission limitations and operational restrictions specified in 40 CFR Part 63.3280 – 63.3420. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District Office or local air agency.

b. As specified in 40 CFR 63.3340, Table 2 to 40 CFR Part 63, Subpart JJJJ - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ, shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

c. This emissions unit shall be equipped with a permanent total enclosure system with 100 percent capture efficiency, in accordance with Appendix M-Part 51-Method 204 and a thermal incinerator with a minimum 95 percent VOC (Volatile Organic Compound) and Organic HAP (Hazardous Air Pollutants) control efficiency thus giving an overall control efficiency of 95 percent.

d. The curing oven emissions shall not exceed the following:

0.14 lb of NOx/MMBtu, 9.2 TPY of NOx;

0.0006 lb of SO2/MMBtu, 0.04 TPY of SO2;

0.035 lb of CO/MMBtu, 2.3 TPY of CO;

0.0058 lb of VOC/MMBtu; and

0.0137 lb of PM/PM10/MMBtu, 0.9 TPY of PM/PM10.

e. The incinerator emissions shall not exceed the following:

0.10 lb of NOx/MMBtu, 0.75 TPY of NOx;

0.0006 lb of SO2/MMBtu, 0.004 TPY of SO2;

0.021 lb of CO/MMBtu, 0.16 TPY of CO;

0.0058 lb of VOC/MMBtu; and

0.012 lb of PM/PM10/MMBtu, 0.09 TPY of PM/PM10.

f. The lbs of VOC/hr emission limitation, lbs of formaldehyde/hr emission limitation, the lb/MMBtu and non-rolling TPY emission limitations for natural gas combustion established in PTI 14-4511 were based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

a. the name and identification number of each coating, as applied; and

b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

where:

$D_C$ = the density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

$V_S$ = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

$W_{VM}$ = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_W$ = weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$ = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(f), and OAC rule 3745-21-10(B)(8)).

(2) The permittee shall collect and record the organic HAP content, recorded in kg of organic HAP/kg of coating material, for each coating employed during the month. The organic HAP content shall be determined by the methods specified in 40 CFR Part 63.3370(b).

Currently, the permittee has chosen to demonstrate compliance with the HAP content restrictions by the use of "as-purchased" compliant coating materials (40 CFR 63.3370(a)(1)). Should the permittee choose another compliance option as provided for in 63.3370(a)(2)-63.3370(a)(6), the permittee shall collect and record the information specified in 63.3370(a)(2)-63.3370(a)(6) and 63.3410(a) to demonstrate ongoing compliance.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.3370(a)(1)(i), 63.3370(b), and 63.3410(a)(1)(vi))

(3) The permittee shall collect and record the following information for this emissions unit on a monthly basis:

a. the name and identification number of each coating and cleanup material employed;

b. the VOC content of each coating and cleanup material, as applied;

c. the number of gallons of each coating and cleanup material employed;

d. the total VOC emissions from all coatings and cleanup materials employed (the summation of d)(3)b. X d)(3)c. X the control efficiency demonstrated during the most recent stack test, in pounds or tons;

e. the total amount of natural gas combusted in the curing oven and the total VOC emissions from the combustion of natural gas in the curing oven (the total amount of natural gas burned per month in cubic feet X 1000 Btu/cubic foot of natural gas X 0.0058 lb of VOC/MMBtu*); and

*emission factor taken from AP 42, Fifth Edition, 1/95, Section 1.4 Natural Gas Combustion

f. the total VOC emissions from this emissions unit, d)(3).d. + d)(3)e.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

(4) The permittee shall collect and record the following information on a monthly basis:

a. the combined total VOC emissions from all coatings, cleanup materials employed, and natural gas combustion in emissions units K006 and K014 (the summation of the values from d)(3)f. and d)(3)f. for emissions units K006 and K014, respectively), in tons; and

b. the total combined rolling, 12-month summation of the VOC emissions for emissions units K006 and K014 (the current monthly total VOC emissions added to the total VOC emissions for the previous 11 months), in tons.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

(5) The CAM plan for monitoring the control efficiency for the thermal oxidizer controlling this emission is based on measuring the temperature within the combustion chamber of the thermal oxidizer. The indicator range was set at a value such that the 3-hour average temperature within the combustion chamber of the thermal oxidizer shall not be more than 50 degrees Fahrenheit below the average temperature recorded during the most recent stack test that demonstrated compliance.

Acceptable values for the temperature of the combustion chamber of the thermal oxidizer are those values that fall within the indicator range specified above.

The indicator range noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM, 3745-31-05(A)(3), and 3745-77-07(C)(1))

(6) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

Upon detecting an excursion of the thermal oxidizer temperature indicator range listed in d)(5), the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion.

(Authority for term: 40 CFR Part 64 CAM, 3745-31-05(A)(3),and 3745-77-07(C)(1))

(7) Whenever the monitored values for the average temperature within the combustion chamber of the thermal oxidizer deviate from the indicator range specified in d)(5), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began and ended;

b. the magnitude of the deviation;

c. the date(s) the investigation was conducted;

d. the names of the personnel who conducted the investigation; and

e. the findings and recommendations of the investigation.

(Authority for term: 40 CFR Part 64 CAM, 3745-31-05(A)(3), and 3745-77-07(A)(1))

(8) In response to each required investigation required in d)(7) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the indicator range specified in d)(5). The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64 CAM and 3745-77-07(C)(1))

(9) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(10) The CAM plan to demonstrate ongoing compliance with the capture efficiency for this emissions unit is the use of a Permanent Total Enclosure and compliance with 40 CFR 51, Appendix M, Method 204. The requirements of which are specified in d)(11) - d)(17) below.

(Authority for term: 40 CFR Part 64 CAM, 3745-31-05(A)(3), and 3745-77-07(A)(1))

(11) The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40

CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit.

(Authority for term: 40 CFR Part 64 CAM, 3745-31-05(A)(3), and 3745-77-07(A)(1))

(12) The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

a. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

$$ED = (4\ area/\pi)^{0.5}$$

b. The total area of all natural draft openings ($A_N$) shall not exceed 5 percent of the total surface area of the enclosure ($A_T$), i.e, the four walls, floor, and ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

$$NEAR = A_N / A_T$$

c. The direction of air flow through all natural draft openings shall be into the enclosure. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H2O), whenever the emissions unit is in operation

d. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in “b”, shall be completely closed to any air movement during process operations.

e. All VOC emissions shall be captured and contained for discharge through the control device.

(Authority for term: 40 CFR Part 64 CAM, 3745-31-05(A)(3), 40 CFR 51, Appendix M, Method 204, and 3745-77-07(A)(1))

(13) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. the measured diameter of each natural draft opening;

b. the distance measured from each natural draft opening to each VOC emitting point;

c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;

d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and

e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.

(Authority for term: 40 CFR Part 64 CAM, 3745-31-05(A)(3), 40 CFR 51, Appendix M, Method 204, and 3745-77-07(A)(1))

(14) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices 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. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and

b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

Upon detecting an excursion of the minimum pressure differential of 0.007 inches of water, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion.

(Authority for term: 40 CFR Part 64 CAM, 3745-31-05(A)(3), 40 CFR 51, Appendix M, Method 204, and 3745-77-07(A)(1))

(15) Whenever the monitored values for the pressure differential is less than 0.007 inches of water, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began and ended;

b. the magnitude of the deviation;

c. the date(s) the investigation was conducted;

d. the names of the personnel who conducted the investigation; and

e. the findings and recommendations of the investigation.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

(16) In response to each required investigation required in d)(15) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the minimum pressure differential. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64 CAM and 3745-77-07(C)(1))

(17) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

(18) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-04511: d)(1) - d)(17). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(Authority for term: OAC rule 3745-77-07(C)(1)and OAC rule 3745-21-09(B)(3)(g))

(2) The permittee shall submit semi-annual compliance reports in accordance with 40 CFR Part 63.3400(c) by January 31 and July 31 of each year covering the previous six calendar months of operation. The semi-annual compliance reports shall contain the following information as specified in 40 CFR Part 63.3400(c)(2):

a. company name and address;

b. statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report;

c. the date of the report and beginning and ending dates of the reporting period;

d. if there are no deviations from the organic HAP emission limitations as specified in b)(2), a statement that there were no deviations from the emissions limitations during the reporting period; and,

e. if there were any deviations from the organic HAP emission limitations as specified in b)(2). during the reporting period, the report shall include the following information:

i. the total operating time of each affected source during the reporting period; and,

ii. information on the number, duration, and cause of the deviations (including unknown cause), if applicable, and the corrective action taken.

In addition to the above, the semi-annual compliance report shall include additional information if the following changes occur at the facility: 1) a change occurs at the facility or within the process that might affect its compliance status; 2) a change from what was reported in the Initial Notification of Compliance Status occurs at the facility or within the process; or 3) a change to another emission limitation option under 40 CFR Part 63, Subpart JJJJ.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63.3400(c))

(3) The permittee shall submit quarterly deviation (excursion) reports for any monthly record documenting an exceedance of the total combined rolling, 12-month emission limitation for VOC from emissions units K006 and K014.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

(4) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. all 3-hour blocks when the average temperature within the combustion chamber of the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature recorded during the most recent stack test that demonstrated compliance;

b. all 3-hour blocks of time (when the emissions unit was in operation) during which the minimum pressure differentia of 0.007 inches of water was not maintained;

c. an identification of each incident of deviation described in e)(4)a. or e)(4)b. where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in e)(4)a. or e)(4)b. where prompt corrective action, that would bring the average temperature within the combustion chamber or the minimum pressure differential into compliance with the acceptable value, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in e)(4)a. or e)(4)b. where proper records were not maintained for the investigation and/or the corrective action.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-04511: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. VOC Content Limitation:

The VOC content of the coatings employed shall not exceed 2.9 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

If required, USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-21-10(B))

b. Organic HAP Emission Limitation:

Organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) for each month..

Applicable Compliance Method:

Compliance with the applicable organic HAP emission limitation shall be demonstrated by the methods listed in c)(1) and the record keeping requirements in d)(2).

(Authority for term: OAC rule 3745-77-07(C)(1), and 40 CFR Part 63.3360(c))

c. Emission Limitation:

The total combined VOC emissions from emissions units K006 and K014 shall not exceed 98.9 tons per year based on a rolling 12-month summation.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(4).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

d. Emission Limitations:

The curing oven emissions shall not exceed the following:

0.14 lb of NOx/MMBtu, 9.2 TPY of NOx;

0.0006 lb of SO2/MMBtu, 0.04 TPY of SO2;

0.035 lb of CO/MMBtu, 2.3 TPY of CO;

0.0058 lb of VOC/MMBtu; and

0.0137 lb of PM/PM10/MMBtu, 0.9 TPY of PM/PM10.

The incinerator emissions shall not exceed the following:

0.10 lb of NOx/MMBtu, 0.75 TPY of NOx;

0.0006 lb of SO2/MMBtu, 0.004 TPY of SO2;

0.021 lb of CO/MMBtu, 0.16 TPY of CO;

0.0058 lb of VOC/MMBtu; and

0.012 lb of PM/PM10/MMBtu, 0.09 TPY of PM/PM10.

Applicable Compliance Method:

The lbs of formaldehyde/hr, the lb/MMBtu and non-rolling TPY emission limitations were established using worst case operating scenarios and the appropriate emission factors from AP 42, Fifth Edition, 1/95, Section 1.4, Natural Gas Combustion. The lbs of VOC/hr emission limitation for the coatings was established using a worst case operating scenario and the maximum VOC

coating content. Compliance with the lbs of formaldehyde/hr emission limitation, and the lb/MMBtu and non-rolling TPY emission limitations can be demonstrated using the records required pursuant to d)(3) and the appropriate emission factors from AP 42, Fifth Edition, Section 1.4, Natural Gas Combustion. Compliance with the lbs VOC/hr emission limitation for the coatings can be demonstrated using the worst case operating scenario and the VOC coating content records required pursuant to d)(3).

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

The emission testing shall be conducted within six-months of permit issuance and within 6-months of its expiration.

The emission testing shall be conducted to demonstrate compliance with the lbs of VOC/hr emission limitation and the overall control efficiency requirement.

The following test method(s) shall be employed to demonstrate compliance with the lbs VOC/hr emission limitation and the overall control efficiency requirement:

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The mass rate of emissions shall be determined using Methods 1-4 and 25 of 40 CFR Part 60, Appendix A

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-04511:f)(1) - f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

## 5. P060, #4 Trimming Operation

**Operations, Property and/or Equipment Description:**

Trim Line with Cyclone (formerly Z021 and P001)

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 14-02783) | See b)(2)a.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). |
| b. | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule. |
| c. | OAC rule 3745-17-11 | The lbs of PE/hr emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| d. | 40 CFR Part 64 Compliance Assurance Monitoring (CAM) | (d)(1) - d)(6). |

(2) Additional Terms and Conditions

a. The total combined particulate emissions(PE) and particulate emissions with a diameter less than 10 microns (PM10) from emissions units P060 and P072 shall not exceed the following:

1.2 lbs of PE/hr and 0.9 lb of PM10/hr*; and

5.27 TPY of PE and 3.94 TPY of PM10*.

Emissions units P060 (trim line) and P072 (sand line) are operationally united. They have individual control devices and combined emission limitations.

*The PE and PM10 emission limitations established in PTI 14-2783 were based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit is based on visible emission observations and the quarterly inspections of the cyclones specified in d)(5). For visible emissions, an excursion is defined as any occasion when visible emissions are observed exiting the baghouse stack and are not deemed to be from normal operations.

The definition of excursion noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the excursion definition above based upon information obtained during future emission tests that demonstrate compliance with the emission limitations for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM, OAC rules 3745-31-05(A)(3), and 3745-77-07(C)(1))

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the

emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(3) The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(5) The permittee shall conduct an internal inspection of the cyclones controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following;

a. a review of the structural integrity for all components of the cyclone;

b. inspection of the inside surfaces of the cyclone tubes for deposits or blockages; and

c. an inspection of the bottom of the cyclone tubes for plugging.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(6) The permittee shall collect and record the following information regarding the quarterly cyclone inspection required above;

a. the date and time the inspection took place;

b. the name and job title of the employee(s) conducting the inspection;

c. a summary of any problems found during the inspection; and

d. a listing of corrective actions taken, if any.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-02783: d)(1)-d)(6). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(2) The permittee shall submit an annual report that summarizes the information gathered during the quarterly cyclone inspections required in d)(5) above;

a. the date and time the inspections took place;

b. the name and job title of the employee conducting the inspections;

c. a summary of any problems found during the inspections; and

d. a listing of corrective actions taken, if any.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and cover the previous 12-month period.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-02783: e)(1)-e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

(Authority for term: 40 CFR Part 64 CAM, OAC Rules 3745-77-07(C)(1), and 3745-17-03(B)(1)(a))

b. Emission Limitations:

The total combined particulate emissions (PE) and particulate emissions with a diameter less than 10 microns (PM10) from emissions units P060 and P072 shall not exceed the following:

1.2 lbs of PE/hr and 0.9 lb of PM10/hr; and

5.27 TPY of PE and 3.94 TPY of PM10.

Applicable Compliance Method:

Compliance with the particulate emission limitation may be demonstrated using the following equations:

Trimmer Emissions = 276.3 lbs of PE/hr* X (1 - 0.999)* = 0.3 lb of PE/hr

Sander Emissions = 450.0 lbs of PE/hr* X (1- 0.998)* = .09 lb of PE/PM10/hr

TOTAL = 1.2 lbs of PE/hr.

Trimmer Emissions = 0.3 lb of PE/hr X 8760 hrs/yr X 1 ton/2000 lbs = 1.32 TPY PE

Sander Emissions = 0.9 lb of PE/hr X 8760 hrs/yr X 1 ton/2000 lbs = 3.94 TPY PE/PM10

TOTAL = 5.26 TPY of PE.

*Based on material balance and emission information submitted with PTI application 14-2783 dated on 8/24/92.

For compliance with the PM10 emission limitations, assume all the trimmer emissions are greater than 10 microns and all of the sander emissions are less than 10 microns.

Should stack testing be required to demonstrate compliance with the lbs of PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A shall be used.

(Authority for term: OAC rules 3745-31-05(A)(3), and 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-02783:f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

## 6. P061, #5 Trimming Operation

**Operations, Property and/or Equipment Description:**

Trim line with cyclone (formerly Z022 and P025)

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | ORC 3704.03(T) | The cyclone control device associated with emissions unit P061 shall have a control efficiency of 99%. |
| b. | OAC rule 3745-31-05(D), synthetic minor to avoid PSD | The total combined particulate emissions (PE) from emissions units P061 and P073 shall not exceed 23.72 tons per year based on a rolling, 12-month summation.<br><br>See c)(1). |
| c. | OAC rule 3745-31-05(A)(3), as effective 11/30/01 | The particulate emissions with 10 microns and less in diameter (PM10) from emissions unit P061 shall not exceed 0.27 pound per hour and 1.18 TPY.<br><br>See b)(2)a. and b)(2)c. |
| d. | OAC rule 3745-31-05(A)(3)(b), as effective 12/1/06 | See b)(2)b. |
| e. | OAC rule 3745-17-11 | The hourly particulate emission limitation restriction established by this rule is less stringent than the maximum calculated hourly controlled particulate emission limitation using the control efficiency established pursuant to ORC 3704.03(T) in b)(1)a. |
| f. | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| g. | CAM | d)(1)-d(6). |

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to Install P0106724 for this contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(2):

i. the PM10 emissions from emissions unit P061 shall be vented to the cyclone at all times emissions unit P061 is in operation employing a control efficiency of 99 percent;

ii. the amount of product trimmed/yr processed from emissions unit P061 shall not exceed 30747.6 tons per year; and

iii. the PM10 from emissions unit P061 shall not exceed 1.18 TPY.

c. The hourly mass emission allowable is based upon potential to emit and therefore hourly records to demonstrate compliance are not required.

c) Operational Restrictions

(1) The maximum annual production rate for emissions unit P061 shall not exceed 30747.6 tons per year based upon a rolling, 12-month summation of the production rates. The permittee has existing production records such that this emissions unit does not need to be restricted on a first year production basis.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit is based on visible emission observations and the quarterly inspections of the cyclones specified in d)(5). For visible emissions, an excursion is defined as any occasion when visible emissions are observed exiting the baghouse stack and are not deemed to be from normal operations.

The definition of excursion noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the excursion definition above based upon information obtained during future emission tests that demonstrate compliance with the emission limitations for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM, OAC rules 3745-31-05(A)(3), and 3745-77-07(C)(1))

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(3) The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(5) The permittee shall conduct an internal inspection of the cyclones controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following;

a. a review of the structural integrity for all components of the cyclone;

b. inspection of the inside surfaces of the cyclone tubes for deposits or blockages; and

c. an inspection of the bottom of the cyclone tubes for plugging.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(6) The permittee shall collect and record the following information regarding the quarterly cyclone inspection required above;

a. the date and time the inspection took place;

b. the name and job title of the employee(s) conducting the inspection;

c. a summary of any problems found during the inspection; and

d. a listing of corrective actions taken, if any.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(7) The permittee shall maintain monthly records of the following information:

a. the production rate for each month;

b. the rolling, 12-month summation of the production rates; and

c. the rolling, 12-month summation of the total combined particulate emission limitation from emissions units P061 and P073.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

(8) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0106724: d)(1)-d**)(7)**. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. all exceedances of the rolling, 12-month limitation of the production rate outlined in c)(1); and

b. all exceedances of the rolling, 12-month total combined particulate emission limitation from emissions units P061 and P073.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(2) The permittee shall submit an annual report that summarizes the amount of PM10 emissions generated during the year.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

(3) The permittee shall submit semiannual written reports that identify:

a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: OAC rules 3745-31-05 and 3745-77-07(C)(1))

(4) The permittee shall submit an annual report that summarizes the information gathered during the quarterly cyclone inspections required in d)(5) above;

a. the date and time the inspections took place;

b. the name and job title of the employee conducting the inspections;

c. a summary of any problems found during the inspections; and

d. a listing of corrective actions taken, if any.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and cover the previous 12-month period.

(Authority for term: OAC rules 3745-31-05 and 3745-77-07(C)(1))

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P01016724: e)(1)-e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and production limitation in c)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The total combined particulate emissions (PE) from emissions units P061 and P073 shall not exceed 23.72 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month particulate emission (PE) limitation may be demonstrated using the following equations:

<u>Emissions from Trim Line</u>

(30747.6 tons of product/year) x (0.077 ton of PE/ton of product) x (1-0.99) = 23.67 TPY PE.

<u>Emissions from Sand Line</u>

(28380 tons of product/year) x (0.084 ton of PE/ton of product) x (1-0.99) x (1-.998) = 0.05 TPY of PE.

The total combined particulate emissions (PE) = 23.67 TPY + 0.05 TPY = 23.72 TPY based on a rolling, 12-month summation.

(Authority for term: OAC rules 3745-31-05 and 3745-77-07(C)(1))

b. Emission Limitation:

The PM10 emissions from emissions unit P061shall not exceed 0.27 pound per hour.

Applicable Compliance Method:

Compliance with the short term particulate matter ten microns and less in diameter limitation may be demonstrated using the following equations:

(7020 pounds of product/hr) x (0.077 pound of PE/pound of product) x (0.05 pound of PM10/pound of PE) x (1-0.99) = 0.27 lb of PM10/hr.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

c. Emission Limitation:

The PM10 emissions from emissions unit P061 shall not exceed 1.18 TPY.

Applicable Compliance Method:

Compliance with the annual PM10 emission limitation may be demonstrated using the following equations:

(30747.6 tons of product trimmed/yr) x (0.0770 ton of PE/ton of product) x (0.05 ton of PM10/ton of PE) x (1-0.99) = 1.18 TPY of PM10.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

d. Production Limitation:

The maximum annual production rate for emissions unit P061 shall not exceed 30747.6 tons per year based upon a rolling, 12-month summation of the production rates.

Applicable Compliance Method:

Compliance with the production limitation outlined in c)(1) shall be demonstrated by the recordkeeping requirement in d)(7).

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

e. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rules 3745-31-05 and 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0106724:f)(1). The testing requirements contained in the above-referenced Permit to

Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

## 7. P072, #4 Sanding Operation

**Operations, Property and/or Equipment Description:**

Sanding Line with baghouse (formerly Z033 and P001)

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 14-02783) | See b)(2)a.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). |
| b. | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule. |
| c | OAC rule 3745-17-11 | The lbs of PE/hr emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). |
| d | 40 CFR Part 64 Compliance Assurance Monitoring (CAM) | (d)(1) - d)(6). |

(2) Additional Terms and Conditions

a. The total combined particulate emissions(PE) and particulate emissions with a diameter less than 10 microns (PM10) from emissions units P060 and P072 shall not exceed the following:

1.2 lbs of PE/hr and 0.9 lb of PM10/hr*; and

5.27 TPY of PE and 3.94 TPY of PM10*.

Emissions units P060 (trim line) and P072 (sand line) are operationally united. They have individual control devices and combined emission limitations.

*The PE and PM10 emission limitations established in PTI 14-2783 were based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations..

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit is based on visible emission observations and the pressure drop requirements specified in d)(5). For visible emissions, an excursion is defined as any occasion when visible emissions are observed exiting the baghouse stack and are not deemed to be from normal operations.

The definition of excursion noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the excursion definition above based upon information obtained during future emission tests that demonstrate compliance with the emission limitations for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM, OAC rules 3745-31-05(A)(3), and 3745-77-07(C)(1))

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the

emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(3) The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(5) The CAM plan for this emission is based on measuring the pressure drop across the baghouse and the visible emission observations specified in d)(1) above. The indicator range for the pressure drop across the baghouse shall be maintained between 1 and six inches of water column.

Acceptable values for the pressure drop across the baghouse are those values that fall within the indicator range specified above.

The indicator range noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM, 3745-31-05(A)(3), and 3745-77-07(C)(1))

(6) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. 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.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a Minor Permit Modification.

(Authority for term: 40 CFR Part 64 CAM and 3745-77-07(C)(1))

(7) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(8) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-02783: d)(1)-d)(7). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(2) The permittee shall submit quarterly deviation(excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-02783: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

(Authority for term: 40 CFR Part 64 CAM, OAC Rules 3745-77-07(C)(1), and 3745-17-03(B)(1)(a))

b. Emission Limitations:

The total combined particulate emissions (PE) and particulate emissions with a diameter less than 10 microns (PM10) from emissions units P060 and P072 shall not exceed the following:

1.2 lbs of PE/hr and 0.9 lb of PM10/hr; and

5.27 TPY of PE and 3.94 TPY of PM10.

Applicable Compliance Method

Compliance with the particulate emission limitation may be demonstrated using the following equations:

Trimmer Emissions= 276.3 lbs of PE/hr* X (1 - 0.999)* = 0.3 lb of PE/hr.

Sander Emissions = 450.0 lbs of PE/hr* X (1- 0.998)* = 0.9 lb PE/PM10/hr.

TOTAL = 1.2 lbs of PE/hr.

Trimmer Emissions = 0.3 lb of PE/hr X 8760 hrs/yr X 1 ton/2000 lbs = 1.32 TPY of PE.

Sander Emissions = 0.9 lb of PE/hr X 8760 hrs/yr X 1 ton/2000 lbs = 3.94 TPY of PE/PM10.

TOTAL = 5.26 TPY of PE.

*Based on material balance and emission information submitted with PTI application 14-2783 dated on 8/24/92.

For compliance with the PM10 emission limitations, assume all the trimmer emissions are greater than 10 microns in diameter and all of the sander emissions are less than 10 microns in diameter.

Should stack testing be required to demonstrate compliance with the lbs of PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A shall be used.

(Authority for term: OAC rules 3745-31-05(A)(3), and 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-02783:f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

## 8. P073, #5 Sanding Operation

**Operations, Property and/or Equipment Description:**

Sanding Line with cyclone and baghouse (formerly Z034 and P025)

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | ORC 3704.03(T) | The cyclone and baghouse control devices associated with emissions unit P073 shall have a control efficiency of 99% and 99.8%, respectively. |
| b. | OAC rule 3745-31-05(D), synthetic minor to avoid PSD | The total combined PE from emissions units P061 and P073 shall not exceed 23.72 tons per year based on a rolling, 12-month summation. |
| c. | OAC rule 3745-31-05(A)(3), as effective 11/30/01 | The particulate emissions with 10 microns and less in diameter (PM10) from emissions unit P073 shall not exceed 0.003 pound per hour and 0.01 TPY.<br><br>See b)(2)a. and b)(2)c. |
| d. | OAC rule 3745-31-05(A)(3)(b), as effective 12/1/06 | See b)(2)b. |
| e. | OAC rule 3745-17-11 | The hourly particulate emission limitation restriction established by this rule is less stringent than the maximum calculated hourly controlled particulate emission limitation using the control efficiencies established pursuant to ORC 3704.03(T) in b)(1)a. |
| f. | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| g. | CAM | d)(1)-d)(9). |

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to Install P0106724 for this contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(2):

i. The PM10 emissions from emissions unit P073 shall be vented to the cyclone and baghouse at all times emissions unit P073 is in operation;

ii. the amount of product sanded/yr processed from emissions unit P073 shall not exceed 28380 tons per year; and

iii. The PM10 from emissions units P073 shall not exceed = 0.01 TPY.

c. The hourly mass emission allowable is based upon potential to emit and therefore hourly records to demonstrate compliance are not required.

c) Operational Restrictions

(1) The maximum annual production rate for emissions unit P073 shall not exceed 28380 tons per year based upon a rolling, 12-month summation of the production rates. The permittee has existing production records such that this emissions unit does not need to be restricted on a first year production basis.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit is based on visible emission observations, the pressure drop requirements specified in d)(5), and the quarterly inspections of the cyclones specified in d)(8). For visible emissions, an excursion is defined as any occasion when visible emissions are observed exiting the baghouse stack and are not deemed to be from normal operations.

The definition of excursion noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the excursion definition above based upon information obtained during future emission tests that demonstrate compliance with the emission limitations for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM, OAC rules 3745-31-05(A)(3), and 3745-77-07(C)(1))

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(3) The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(5) The CAM plan for this emissions unit is based on visible emission observations, the pressure drop requirements specified in d)(5), and the quarterly inspections of the cyclones specified in d)(8). The indicator range for the pressure drop across the baghouse shall be maintained between 1 and six inches of water column.

Acceptable values for the pressure drop across the baghouse are those values that fall within the indicator range specified above.

The indicator range noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM, 3745-31-05(A)(3), and 3745-77-07(C)(1))

(6) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. 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.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the

cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a Minor Permit Modification.

(Authority for term: 40 CFR Part 64 CAM and 3745-77-07(C)(1))

(7) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be

required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(8) The permittee shall conduct an internal inspection of the cyclones controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following;

a. a review of the structural integrity for all components of the cyclone;

b. inspection of the inside surfaces of the cyclone tubes for deposits or blockages; and

c. an inspection of the bottom of the cyclone tubes for plugging.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(9) The permittee shall collect and record the following information regarding the quarterly cyclone inspection required above;

a. the date and time the inspection took place;

b. the name and job title of the employee(s) conducting the inspection;

c. a summary of any problems found during the inspection; and

d. a listing of corrective actions taken, if any.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(10) The permittee shall maintain monthly records of the following information:

a. the production rate for each month;

b. the rolling, 12-month summation of the production rates; and

c. the rolling, 12-month summation of the total combined particulate emission limitation from emissions units P061 and P073.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

(11) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0106724: d)(1)-d)(10). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. all exceedances of the rolling, 12-month limitation of the production rate outlined in c)(1); and

b. all exceedances of the rolling, 12-month total combined particulate emission limitation from emissions units P061 and P073.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

(2) The permittee shall submit an annual report that summarizes the amount of particulate emissions with 10 microns and less in diameter generated during the year.

(Authority for term: OAC rules 3745-31-05 and 3745-77-07(C)(1))

(3) The permittee shall submit semiannual written reports that identify:

a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(4) The permittee shall submit quarterly deviation(excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(5) The permittee shall submit an annual report that summarizes the information gathered during the quarterly cyclone inspections required in d)(8) above;

a. the date and time the inspections took place;

b. the name and job title of the employee conducting the inspections;

c. a summary of any problems found during the inspections; and

d. a listing of corrective actions taken, if any.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and cover the previous 12-month period.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P01016724: e)(1)-e)(5). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The total combined particulate emissions (PE) from emissions units P061 and P073 shall not exceed 23.72 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month particulate emission (PE) limitation may be demonstrated using the following equations:

<u>Emissions from Trim Line</u>

(30747.6 tons of product trimmed/year) x (0.077 ton of PE/ton of product trimmed) x (1-0.99) = 23.67 TPY of PE.

<u>Emissions from Sand Line</u>

(28380 tons of product sanded/year) x (0.084 ton of PE/ton of product sanded) x (1-0.99) x (1-0.998) = 0.05 TPY of PE.

The total combined particulate emissions (PE) = 23.67 TPY + 0.05 TPY = 23.72 TPY based on a rolling, 12-month summation.

(Authority for term: OAC rules 3745-31-05 and 3745-77-07(C)(1))

b. Emission Limitation:

The PM10 emissions from emissions unit P073 shall not exceed 0.003 pound per hour.

Applicable Compliance Method:

Compliance with the hourly PM10 emission may be demonstrated using the following equations:

(6479 pounds of product/hr) x (0.084 pound of PE/pound product) x (0.238 pound of PM10/pound PE) x (1-.99) x (1-.998) = 0.003 lb of PM10/hr.

(Authority for term: OAC rules 3745-31-05 and 3745-77-07(C)(1))

c. Emission Limitation:

The PM10 emissions from emissions unit P073 shall not exceed 0.01 TPY.

Applicable Compliance Method:

Compliance with the annual PM10 emission limitation may be demonstrated using the following equations:

28380 tons of product sanded/year x 0.084 ton of PE/ton of product sanded x 0.238 ton of PM10/ton of PE x (1-.99) x (1-.998) = 0.01 TPY.

(Authority for term: OAC rules 3745-31-05 and 3745-77-07(C)(1))

d. Production Limitation:

The maximum annual production rate for emissions unit P073 shall not exceed 28380 tons per year based upon a rolling, 12-month summation of the production rates.

Applicable Compliance Method:

Compliance with the production limitation outlined in c)(1) shall be demonstrated by the recordkeeping requirement in d)(10).

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

e. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rules 3745-31-05 and 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0106724:f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

## 9. Emissions Unit Group - Natural gas/#2 oil fired boilers: B001, B002, B003,

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| B001 | Natural Gas/No. 2 fuel oil boiler |
| B002 | Natural Gas/No. 2 fuel oil boiler |
| B003 | Natural Gas/No. 2 fuel oil boiler |

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 14-04755)<br><br>Synthetic Minor limitation for SO2 was developed under PTI 14-4755 to avoid PSD review.<br><br>Netting determination for NOx was developed under PTI 14-4755 to avoid PSD review. | The following emission limitations shall not be exceeded when burning natural gas:<br><br>0.005 lb of particulate emissions (PE)/MMBtu of actual heat input;*<br>0.005 lb of particulate emissions with a diameter of less than 10 microns (PM10) /MMBtu of actual heat input;*<br>0.0006 lb of sulfur dioxide (SO2)/MMBtu of actual heat input;*<br>0.08 lb of nitrogen oxides (NOx)/MMBtu of actual heat input;*<br>0.10 lb of carbon monoxide(CO)/MMBtu of actual heat input;* and<br>0.004 lb of volatile organic compounds (VOC)/MMBtu of actual heat input.*<br><br>The following emission limitations shall not be exceeded when burning Number 2 fuel oil:<br><br>0.020 lb of particulate emissions (PE)/MMBtu of actual heat input;*<br>0.306 lb of sulfur dioxide (SO2)/MMBtu of actual heat input;<br>0.17 lb of nitrogen oxides (NOx)/MMBtu |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | of actual heat input;*<br>0.10 lb of carbon monoxide(CO)/MMBtu of actual heat input;* and<br>0.004 lb of volatile organic compounds (VOC)/MMBtu of actual heat input.*<br><br>*The lb/MMBtu emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping and/or reporting requirements are necessary to demonstrate compliance.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D)(1)(a), 3745-17-10(B)(1), and 40 CFR Part 60 Subpart Dc. |
| b. | OAC rule 3745-31-05(D)(1)(a) (PTI 14-04755) | See b)(2)a. and c)(1). |
| c. | OAC rule 3745-17-07(A) | The visible emission limitations specified in OAC 3745-17-07(A) are less stringent than the visible emission limitations specified in 40 CFR Part 60 Subpart Dc. |
| d. | OAC rule 3745-17-10(B)(1) | The particulate emissions (PE) specified in OAC 3745-17-10(B)(1) is the same as or less stringent than the PE limitation established in accordance with OAC rule 3745-31-05(A)(3). |
| e. | OAC rule 3745-18-06(D) | The sulfur dioxide emission limitation specified in OAC 3745-18-06(D) is less stringent than the sulfur dioxide emission limitation established in accordance with OAC rule 3745-31-05(A)(3). |
| f. | 40 CFR Part 60 Subpart Dc | Excluding periods of startup, shutdown, or malfunction, visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except for one six-minute period per hour of not more than 27% opacity. |

(2) Additional Terms and Conditions

a. The total combined emissions from emissions units B001-B003 shall not exceed the following based on a rolling, 12-month summation:

6.55 TPY of PE;

5.38 TPY PM10

3.87 TPY of VOC;

96.6 TPY of CO;

87.2 TPY of NOx; and

38.7 TPY SO2.

c) Operational Restrictions

(1) The total amount of No.2 fuel oil burned in emissions units B001-B003, combined, shall not exceed 1,790,000 gallons per year based upon a rolling, 12-month summation.

(Authority for term: OAC rules 3745-31-05(D)(1)(a) and 3745-77-07(A)(1))

(2) The quality of the No. 2 fuel oil burned in this emissions unit shall meet the following specifications:

a. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.306 pound of sulfur dioxide/MMBtu actual heat input; and

b. greater than 130,000 Btu/gallon of oil.

Compliance with the above-mentioned specifications shall be determined by using the analytical results collected and recorded in d)(1).

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

(3) The permittee shall burn only natural gas and/or No.2 fuel oil in this emissions unit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the records specified in either Option 1 or Option 2 below to document the quality of the fuel oil burned in this emissions unit.

Option 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or ASTM D7039 Standard Test Method for Sulfur in Gasoline and Diesel fuel by Monochromatic Wavelength Dispersive X-ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

Option 2

The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or ASTM D7039 Standard Test Method for Sulfur in Gasoline and Diesel fuel by

Monochromatic Wavelength Dispersive X-ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

(Authority for term: OAC rules 3745-31-05(A)(3), OAC 3745-18-04, and 3745-77-07(C)(1))

(2) The permittee shall collect and record the following information on a monthly basis:

a. The total amounts of natural gas and fuel oil burned in emissions units B001-B003, combined.

b. The rolling, 12-month summation of the fuel oil usage totals recorded in d)(2)a. (i.e., the current month's total added to the previous 11-month total).

(Authority for term: OAC rules 3745-31-05(D)(1)(a) and 3745-77-07(C)(1)

(3) For each day during which the permittee burns a fuel other than natural gas and/or No.2 oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-77-07(C)(1)

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-04755: d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record which shows a deviation from the allowable sulfur dioxide emission limitation contained in this permit, based upon the sulfur dioxide emission rates calculated in accordance with the formula specified in OAC rule 3745-18-04(F). The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 45 days after the deviation occurs.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or No.2 oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(3) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month fuel oil usage limitation of 1,790,000 gallons.

(Authority for term: OAC rules 3745-31-05(D)(1)(a) and 3745-77-07(C)(1))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-04755: e)(1)-e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in a) and b) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitations:

0.020 lb of PE/MMBtu of actual heat input when burning No.2 fuel oil.

0.005 lb of PE/PM10/MMBtu of actual heat input when burning natural gas.

The total combined emissions from emissions units B001-B003 shall not exceed 6.55 TPY of PE and 5.38 TPY of PM10 based on a rolling, 12-month summation.

Applicable compliance method when burning natural gas:

For the use of natural gas, compliance may be determined by multiplying the maximum natural gas usage rate of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs of filterable PE/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr) multiplied by the percentage of particulate emissions with a diameter less than 10 microns.

Applicable compliance method when burning No. 2 fuel oil:

For the use of fuel oil, compliance may be determined by multiplying the maximum fuel oil usage rate of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs of filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb of PE/PM10/MMBtu limitation specified in b)(1)a. and the fuel oil usage restriction specified in c)(1). Should the actual annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in d)(2).

(Authority for term: OAC rules 3745-31-05(A)(3), and 3745-77-07(C)(1))

b. Emission Limitations:

0.306 lb of SO2/MMBtu of actual heat input when burning fuel oil.

0.0006 lb of SO2/MMBtu of actual heat input when burning natural gas.

The total combined emissions from emissions units B001-B003 shall not exceed 38.7 TPY of SO2 based on a rolling, 12-month summation.

Applicable compliance method when burning fuel oil:

Compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by the emission rate calculations collected and recorded pursuant to d)(1).

Applicable compliance method when burning only natural gas:

For the use of natural gas, compliance may be determined by multiplying the hourly gas usage rate of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lb of SO2/MM cu. ft and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/MMBtu limitation specified in b)(1)a. and the fuel oil usage restriction specified in c)(1). Should the actual annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded pursuant to d)(2).

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D)(1)(a), 3745-18-04, and 3745-77-07(C)(1))

c. Emission Limitations:

0.08 lb of NOx/MMBtu of actual heat input when burning only natural gas.

0.17 lb of NOx/MMBtu of actual heat input when burning No. 2 fuel oil.

The total combined emissions from emissions units B001-B003 shall not exceed 87.2 TPY of NOx based on a rolling, 12-month summation.

Applicable compliance method when burning natural gas:

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft./hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of

100 lbs NOx/MM cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when burning No.2 fuel oil:

For the use of No. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 20 lbs of NOx/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/MMBtu limitation specified in b)(1)a. and the fuel oil usage restriction specified in c)(1). Should the actual annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in d)(2).

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D)(1)(a) and 3745-77-07(C)(1))

d. Emission Limitations:

This emissions unit shall not exceed the following limitation:

0.10 lb of CO/MMBtu of actual heat input when burning natural gas and/or No. 2 fuel oil.

The total combined emissions from emissions units B001-B003 shall not exceed 96.6 TPY of CO based on a rolling, 12-month summation.

<u>Applicable compliance method when burning natural gas:</u>

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 84 lbs of CO/MM cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when burning No.2 fuel oil:

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 5 lbs of CO/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/MMBtu limitation specified in b)(1)a. and the fuel oil usage restriction specified in c)(1). Should the actual annual emission rate need to be calculated, the annual emission rate shall be calculated by using

the emission factors and methodologies specified above and the fuel usage information collected and recorded in d)(2).

(Authority for term: OAC rules 3745-31-05(A)(3), and 3745-77-07(C)(1))

e. Emission Limitations:

This emissions unit shall not exceed the following limitation:

0.004 lb of OC/MMBtu of actual heat input when burning natural gas and/or No.2 fuel oil.

The total combined emissions from emissions units B001-B003 shall not exceed 3.87 TPY VOC based on a rolling, 12-month summation.

Applicable compliance method when burning natural gas:

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 5.5 lbs of VOC/MM cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when burning No. 2 fuel oil:

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 0.2 lb of OC/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/MMBtu limitation specified in b)(1)a. and the fuel oil usage restriction specified in c)(1). Should the actual annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in d)(2).

(Authority for term: OAC rules 3745-31-05(A)(3), and 3745-77-07(C)(1))

f. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

g. Compliance with the total combined fuel oil usage limitation in c)(1) shall be determined by the record keeping in d)(2).

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-04755: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

## 10. Emissions Unit Group - Paper treaters: K003, K004, K005,

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| K003 | Paper treaeter #100 |
| K004 | Paper treaeter #101 |
| K005 | Paper treaeter #102 |

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-21-09(PP)(1) | The VOC content of the coatings employed shall not exceed 0.9 pound of VOC per gallon of coating, as applied, excluding water and exempt solvents. |
| b. | 40 CFR Part 63, Subpart JJJJ National Emission Standard for Hazardous Air Pollutants: Paper and other Web Coating<br>(40 CFR 63.3280 – 63.3420)<br><br>In accordance with 40 CFR 63.3300, this emissions unit is a web coating line at an existing facility that is a major source of HAP subject to the emissions limitations / control measures specified in this section. | As specified in 40 CFR 63.3320(b)(2), Organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) for each month.<br><br>See b)(2)b. |
| c. | 40 CFR 63.1-15<br>(40 CFR 63.3340) | See b)(2)a. |

(2) Additional Terms and Conditions

a. This emissions unit is subject to the requirements of 40 CFR Part 63 Subpart JJJJ -National Emissions Standards for Hazardous Air Pollutants for Paper and other Web Coating. The permittee shall comply with the applicable emission limitations and operational restrictions specified in 40 CFR Part 63.3280 – 63.3420. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal

Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District Office or local air agency.

b. As specified in 40 CFR 63.3340, Table 2 to 40 CFR Part 63, Subpart JJJJ - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ, shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

a. the name and identification number of each coating, as applied; and

b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

where:

$D_C$ = the density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

$V_S$ = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

$W_{VM}$ = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_W$ = weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$ = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(f), and OAC rule 3745-21-10(B)(8)).

(2) The permittee shall collect and record the organic HAP content, recorded in kg of organic HAP/kg of coating material, for each coating employed during the month. The organic HAP content shall be determined by the methods specified in 40 CFR Part 63.3370(b).

Currently, the permittee has chosen to demonstrate compliance with the HAP content restrictions by the use of “as-purchased” compliant coating materials (40 CFR

63.3370(a)(1)). Should the permittee choose another compliance option as provided for in 63.3370(a)(2)-63.3370(a)(6), the permittee shall collect and record the information specified in 63.3370(a)(2)-63.3370(a)(6) and 63.3410(a) to demonstrate ongoing compliance.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.3370(a)(1)(i), 63.3370(b), and 63.3410(a)(1)(vi))

e) Reporting Requirements

(1) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(Authority for term: OAC rule 3745-77-07(C)(1)and OAC rule 3745-21-09(B)(3)(g))

(2) The permittee shall submit semi-annual compliance reports in accordance with 40 CFR Part 63.3400(c) by January 31 and July 31 of each year covering the previous six calendar months of operation. The semi-annual compliance reports shall contain the following information as specified in 40 CFR Part 63.3400(c)(2):

a. company name and address;

b. statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report;

c. the date of the report and beginning and ending dates of the reporting period;

d. if there are no deviations from the organic HAP emission limitations as specified in b)(2), a statement that there were no deviations from the emissions limitations during the reporting period; and,

e. if there were any deviations from the organic HAP emission limitations as specified in b)(2). during the reporting period, the report shall include the following information:

i. the total operating time of each affected source during the reporting period; and,

ii. information on the number, duration, and cause of the deviations (including unknown cause), if applicable, and the corrective action taken.

In addition to the above, the semi-annual compliance report shall include additional information if the following changes occur at the facility: 1) a change occurs at the facility or within the process that might affect its compliance status; 2) a change from what was reported in the Initial Notification of Compliance Status occurs at the facility or within the process; or 3) a change to another emission limitation option under 40 CFR Part 63, Subpart JJJJ.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63.3400(c))

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. VOC Content Limitation:

The VOC content of the coatings employed shall not exceed 0.9 pound of VOC per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

If required, USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-21-10(B))

b. Organic HAP Emission Limitation:

Organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) for each month.

Applicable Compliance Method:

Compliance with the applicable organic HAP emission limitation shall be demonstrated by the methods listed in c)(1) and the record keeping requirements in d)(2).

(Authority for term: OAC rule 3745-77-07(C)(1), and 40 CFR Part 63.3360(c))

g) Miscellaneous Requirements

(1) None.

## 11. Emissions Unit Group - Sand Lines: P070 and P071,

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P070 | Sand Line with cyclone and baghouse (formerly Z031) |
| P071 | Sand Line with cyclone and baghouse (formerly Z032) |

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule. |
| b. | OAC rule 3745-17-11 | The particulate emissions (PE) shall not exceed 9.51 lbs per hr. |
| c. | 40 CFR Part 64 Compliance Assurance Monitoring (CAM) | (d)(1) - d)(9). |

(2) Additional Terms and Conditions

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit is based on visible emission observations, the pressure drop requirements specified in d)(5), and the quarterly inspections of the cyclones specified in d)(8). For visible emissions, an excursion is defined as any occasion when visible emissions are observed exiting the baghouse stack and are not deemed to be from normal operations.

The definition of excursion noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the excursion definition above based upon information obtained during future emission tests that demonstrate compliance with the emission limitations for this emissions unit. In addition, approved revisions to the ranges will not constitute a

relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM and 3745-77-07(C)(1))

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(3) The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the

results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(5) The CAM plan for this emissions unit is based on visible emission observations, the pressure drop requirements specified in d)(5), and the quarterly inspections of the cyclones specified in d)(8). The indicator range for the pressure drop across the baghouse shall be maintained between 1 and six inches of water column.

Acceptable values for the pressure drop across the baghouse are those values that fall within the indicator range specified above.

The indicator range noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM, 3745-31-05(A)(3), and 3745-77-07(C)(1))

(6) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. 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.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that

determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a Minor Permit Modification.

(Authority for term: 40 CFR Part 64 CAM and 3745-77-07(C)(1))

(7) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(8) The permittee shall conduct an internal inspection of the cyclones controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following;

a. a review of the structural integrity for all components of the cyclone;

b. inspection of the inside surfaces of the cyclone tubes for deposits or blockages; and

c. an inspection of the bottom of the cyclone tubes for plugging.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(9) The permittee shall collect and record the following information regarding the quarterly cyclone inspection required above;

a. the date and time the inspection took place;

b. the name and job title of the employee(s) conducting the inspection;

c. a summary of any problems found during the inspection; and

d. a listing of corrective actions taken, if any.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(2) The permittee shall submit quarterly deviation(excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(3) The permittee shall submit an annual report that summarizes the information gathered during the quarterly cyclone inspections required in d)(8) above;

a. the date and time the inspections took place;

b. the name and job title of the employee conducting the inspections;

c. a summary of any problems found during the inspections; and

d. a listing of corrective actions taken, if any.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and cover the previous 12-month period.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

(Authority for term: 40 CFR Part 64 CAM, OAC Rules 3745-77-07(C)(1), and 3745-17-03(B)(1)(a))

b. Emission Limitation:

9.51 lbs of PE/Hour.

Applicable Compliance Method:

Compliance with the particulate emission limitation of 9.51 lbs of PE/hr may be demonstrated using the following equation:

450 lbs of PE/hr* X (1-0.998)* = .9 lbs of PE/hr.

*Based on material balance and emission information submitted by company with PTO application dated 3/4/83.

Should stack testing be required to demonstrate compliance with the lbs of PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A shall be used.

(Authority for term: OAC rules 3745-31-05(A)(3), and 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) None.

## 12. Emissions Unit Group - Sand lines: P075, P077,

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P075 | Sand Line with cyclone and baghouse |
| P077 | Sand Line with cyclone and baghouse |

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(D)<br>(PTI 14-05975 for P075)<br>(PTI 14-05994 for P077) | See b)(2)a. |
| b. | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule. |
| c. | OAC rule 3745-17-11(B) | The PE/hr shall not exceed 9.51 pounds per hour. |
| d. | 40 CFR Part 64 Compliance Assurance Monitoring (CAM) | (d)(1) - d)(9). |

(2) Additional Terms and Conditions

a. Permits to Install 14-05975 for P075 and 14-05994 for P077 for these air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available technology (BAT) under OAC rule 3745-31-05(A)(3):

i. for PE and particulate matter 10 microns and less in diameter (PM10) emissions: the permittee shall use a fabric filter to ensure the controlled potential to emit is less than 10.0 tons per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for these emissions units are based on visible emission observations, the pressure drop requirements specified in d)(5), and the quarterly inspections of the cyclones specified in d)(8). For visible emissions, an excursion is defined as any occasion when visible emissions are observed exiting the baghouse stack and are not deemed to be from normal operations.

The definition of excursion noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the excursion definition above based upon information obtained during future emission tests that demonstrate compliance with the emission limitations for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM, OAC rules 3745-31-05(C), and 3745-77-07(C)(1))

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(3) The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(5) The CAM plan for this emissions unit is based on visible emission observations, the pressure drop requirements specified in d)(5), and the quarterly inspections of the cyclones specified in d)(8). The indicator range for the pressure drop across the baghouse shall be maintained between 1 and six inches of water column.

Acceptable values for the pressure drop across the baghouse are those values that fall within the indicator range specified above.

The indicator range noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM, 3745-31-05(C), and 3745-77-07(C)(1))

(6) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. 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.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a Minor Permit Modification.

(Authority for term: 40 CFR Part 64 CAM and 3745-77-07(C)(1))

(7) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(8) The permittee shall conduct an internal inspection of the cyclones controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following;

a. a review of the structural integrity for all components of the cyclone;

b. inspection of the inside surfaces of the cyclone tubes for deposits or blockages; and

c. an inspection of the bottom of the cyclone tubes for plugging.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(9) The permittee shall collect and record the following information regarding the quarterly cyclone inspection required above;

a. the date and time the inspection took place;

b. the name and job title of the employee(s) conducting the inspection;

c. a summary of any problems found during the inspection; and

d. a listing of corrective actions taken, if any.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(10) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permits to Install 14-05975 and 14-05994: d)(1)-d)(9). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(2) The permittee shall submit quarterly deviation(excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(3) The permittee shall submit an annual report that summarizes the information gathered during the quarterly cyclone inspections required in d)(8) above;

a. the date and time the inspections took place;

b. the name and job title of the employee conducting the inspections;

c. a summary of any problems found during the inspections; and

d. a listing of corrective actions taken, if any.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and cover the previous 12-month period.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permits to Install 14-05975 and 14-05994: e)(1)-e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

(Authority for term: 40 CFR Part 64 CAM, OAC Rules 3745-77-07(C)(1), and 3745-17-03(B)(1)(a))

b. Emission Limitation:

The particulate emissions (PE) shall not exceed 9.51 lbs/hr.

Applicable Compliance Method:

Compliance may be demonstrated by the following equation based on a material balance that was conducted by the facility:

6480 lb/hour of product x 8.40 percent to scrap x (1 – 99.8% control efficiency) = 1.08 lbs of PE/hr.

(Authority for term: 40 CFR Part 64 CAM, OAC rule 3745-17-11, and OAC rule 3745-77-07(C)(1))

c. Emission Limitation:

The particulate emissions (PE) and particulate emissions with a diameter less than 10 microns (PM10) shall be less than 10.0 tons per year.

Applicable Compliance Method:

The particulate emission limitations are based on the emission factors and control efficiencies as submitted in the PTI application 14-05975 and 14-05994. The PE rate is 4.77 TPY based on the emissions unit's controlled potential to emit. The annual PE rate was calculated by multiplying the maximum throughput rate of 6480 lbs/hour x 8.40 percent to scrap x (1 – 99.8% control efficiency) by 8760 hours per year and dividing by 2000 pounds per ton.

(Authority for term: OAC rules 3745-31-05(D), and 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permits to Install 14-05975 and 14-05994:f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

**13. Emissions Unit:P058,**

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P058 | Trim line with cyclone |

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule. |
| b. | OAC rule 3745-17-11 | The particulate emissions (PE) shall not exceed 9.51 lbs/hr. |
| c. | 40 CFR Part 64 Compliance Assurance Monitoring (CAM) | (d)(1) - d)(6). |

(2) Additional Terms and Conditions

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit is based on visible emission observations and the quarterly inspections of the cyclones specified in d)(5). For visible emissions, an excursion is defined as any occasion when visible emissions are observed exiting the baghouse stack and are not deemed to be from normal operations.

The definition of excursion noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the excursion definition above based upon information obtained during future emission tests that demonstrate compliance with the emission limitations for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM and 3745-77-07(C)(1))

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(3) The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(5) The permittee shall conduct an internal inspection of the cyclones controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following;

a. a review of the structural integrity for all components of the cyclone;

b. inspection of the inside surfaces of the cyclone tubes for deposits or blockages; and

c. an inspection of the bottom of the cyclone tubes for plugging.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(6) The permittee shall collect and record the following information regarding the quarterly cyclone inspection required above;

a. the date and time the inspection took place;

b. the name and job title of the employee(s) conducting the inspection;

c. a summary of any problems found during the inspection; and

d. a listing of corrective actions taken, if any.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(2) The permittee shall submit an annual report that summarizes the information gathered during the quarterly cyclone inspections required in d)(5) above;

a. the date and time the inspections took place;

b. the name and job title of the employee conducting the inspections;

c. a summary of any problems found during the inspections; and

d. a listing of corrective actions taken, if any.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and cover the previous 12-month period.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

(Authority for term: 40 CFR Part 64 CAM, OAC Rules 3745-77-07(C)(1), and 3745-17-03(B)(1)(a))

b. Emission Limitation:

9.51 lbs of PE/Hour.

Applicable Compliance Method:

Compliance with the particulate emission limitation of 9.51 lbs of PE/hr may be demonstrated using the following equation:

276.3 lbs of PE/hr* X (1-0.99)* = 2.76 lb of PE/hr.

*Based on material balance and emission information submitted by company with PTO application dated 3/4/83.

Should stack testing be required to demonstrate compliance with the lbs of PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A shall be used

(Authority for term: 40 CFR Part 64 CAM, OAC rules 3745-17-11 and 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-03784: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

## 14. Emissions Unit Group - Trim lines: P074, P076,

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P074 | Trim Line with cyclone |
| P076 | Trim Line with cyclone |

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 14-05975 for P074)<br>(PTI 14-05994 for P076) | Particulate emissions (PE) from this emissions unit shall not exceed 5.4 lbs/hour and 23.67 tons per year.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1). |
| b. | OAC rule 3745-31-05(D)<br>(PTI 14-05975 for P074)<br>(PTI 14-05994 for P076) | See b)(2)a. |
| c. | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule. |
| d. | OAC rule 3745-17-11(B) | The emission limitation specified by this rule is less stringent than the emission limitation specified by OAC rule 3745-31-05(A)(3). |
| e. | 40 CFR Part 64 Compliance Assurance Monitoring (CAM) | (d)(1) - d)(6). |

(2) Additional Terms and Conditions

a. Permits to Install 14-05975 for P074 and 14-05994 for P076 for these air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available technology (BAT) under OAC rule 3745-31-05(A)(3):

i. particulate matter 10 microns and less in diameter (PM10) emissions: the permittee shall use a cyclone to ensure the controlled potential to emit is less than 10.0 tons per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for these emissions units are based on visible emission observations and the quarterly inspections of the cyclones specified in d)(5). For visible emissions, an excursion is defined as any occasion when visible emissions are observed exiting the baghouse stack and are not deemed to be from normal operations.

The definition of excursion noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the excursion definition above based upon information obtained during future emission tests that demonstrate compliance with the emission limitations for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM, OAC rules 3745-31-05(A)(3), and 3745-77-07(C)(1))

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the

emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(3) The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(5) The permittee shall conduct an internal inspection of the cyclones controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following;

a. a review of the structural integrity for all components of the cyclone;

b. inspection of the inside surfaces of the cyclone tubes for deposits or blockages; and

c. an inspection of the bottom of the cyclone tubes for plugging.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(6) The permittee shall collect and record the following information regarding the quarterly cyclone inspection required above;

a. the date and time the inspection took place;

b. the name and job title of the employee(s) conducting the inspection;

c. a summary of any problems found during the inspection; and

d. a listing of corrective actions taken, if any.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permits to Install 14-05975 and 14-05994: d)(1)-d)(6). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(2) The permittee shall submit an annual report that summarizes the information gathered during the quarterly cyclone inspections required in d)(5) above;

a. the date and time the inspections took place;

b. the name and job title of the employee conducting the inspections;

c. a summary of any problems found during the inspections; and

d. a listing of corrective actions taken, if any.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and cover the previous 12-month period.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permits to Install 14-05975 and 14-05994: e)(1)-e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

(Authority for term: 40 CFR Part 64 CAM, OAC Rules 3745-77-07(C)(1), and 3745-17-03(B)(1)(a))

b. Emission Limitations:

Particulate emissions (PE) from this emissions unit shall not exceed 5.4 lb/hour and 23.67 tons per year.

Applicable Compliance Method:

The particulate emission limitations are based on the emission factors and control efficiencies as submitted in the PTI applications 14-05975 and 14-05994.

The PE rate is 23.67 TPY based on the emissions unit's controlled potential to emit. The annual PE rate was calculated by multiplying the maximum throughput rate of 7020 lb/hour x 7.70 percent to scrap x (1 - 99.0% control efficiency) by 8760 hours per year and dividing by 2000 pounds per ton.

(Authority for term: OAC rules 3745-31-05(A)(3), and 3745-77-07(C)(1))

c. Emission Limitation:

Particulate Matter 10 microns and less in diameter (PM10) emissions from this emissions unit shall be less than 10.0 tons per year.

Applicable Compliance Method:

The annual PM10 emission rate is 1.18 TPY based on the emissions unit's controlled potential to emit. The annual PM10 emission rate was calculated by multiplying the maximum throughput rate of 7020 lb/hour x 7.70 percent to scrap x 5.0% PM10 x (1 - 99.0% control efficiency) by 8760 hours per year and dividing by 2000 pounds per ton.

(Authority for term: OAC rules 3745-31-05(D), and 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permits to

Install 14-05975 and 14-05994: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

## 15. Emissions Unit Group - Trim lines:P059,

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P059 | Trim line with cyclone and baghouse |

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule. |
| b. | OAC rule 3745-17-11 | 9.51 lbs of particulate emissions (PE)/hr. |
| c. | 40 CFR Part 64 Compliance Assurance Monitoring (CAM) | (d)(1) - d)(9). |

(2) Additional Terms and Conditions

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit is based on visible emission observations, the pressure drop requirements specified in d)(5), and the quarterly inspections of the cyclones specified in d)(8). For visible emissions, an excursion is defined as any occasion when visible emissions are observed exiting the baghouse stack and are not deemed to be from normal operations.

The definition of excursion noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the excursion definition above based upon information obtained during future emission tests that demonstrate compliance with the emission limitations for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM, OAC rule 3745-77-07(C)(1))

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(3) The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(4) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(5) The CAM plan for this emissions unit is based on visible emission observations, the pressure drop requirements specified in d)(5), and the quarterly inspections of the cyclones specified in d)(8). The indicator range for the pressure drop across the baghouse shall be maintained between 1 and six inches of water column.

Acceptable values for the pressure drop across the baghouse are those values that fall within the indicator range specified above.

The indicator range noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(6) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. 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.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a Minor Permit Modification.

(Authority for term: 40 CFR Part 64 CAM and 3745-77-07(C)(1))

(7) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(8) The permittee shall conduct an internal inspection of the cyclones controlling this emissions unit on a quarterly basis. At a minimum, the inspection shall include the following;

a. a review of the structural integrity for all components of the cyclone;

b. inspection of the inside surfaces of the cyclone tubes for deposits or blockages; and

c. an inspection of the bottom of the cyclone tubes for plugging.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(9) The permittee shall collect and record the following information regarding the quarterly cyclone inspection required above;

a. the date and time the inspection took place;

b. the name and job title of the employee(s) conducting the inspection;

c. a summary of any problems found during the inspection; and

d. a listing of corrective actions taken, if any.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: 40 CFR Part 64 CAM, and OAC rule 3745-77-07(C)(1))

(2) The permittee shall submit quarterly deviation(excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

(3) The permittee shall submit an annual report that summarizes the information gathered during the quarterly cyclone inspections required in d)(8) above;

a. the date and time the inspections took place;

b. the name and job title of the employee conducting the inspections;

c. a summary of any problems found during the inspections; and

d. a listing of corrective actions taken, if any.

These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and cover the previous 12-month period.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1))

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

(Authority for term: 40 CFR Part 64 CAM, OAC Rules 3745-77-07(C)(1), and 3745-17-03(B)(1)(a))

b. Emission Limitation:

9.51 lbs of PE/Hour.

Applicable Compliance Method:

Compliance with the particulate emission limitation of 9.51 lbs of PE/hr may be demonstrated using the following equation:

276.3 lbs of PE/hr* X (1-0.99)* = 2.76 lb PE/hr.

*Based on material balance and emission information submitted by company with PTO application dated 3/4/83.

Should stack testing be required to demonstrate compliance with the lbs of PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A shall be used.

(Authority for term: OAC rules 3745-17-11 and 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) None.