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

Certified Mail

9/6/2011

Mr. DAVID MODROWSKI
UNION TANK CAR CO.
175 W JACKSON BLVD
CHICAGO, IL 60604

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0351010025
Permit Number: P0087313
Permit Type: Renewal
County: Marion

Dear Permit Holder:

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

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

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NWDO

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
UNION TANK CAR CO.

Facility ID:	0351010025
Permit Number:	P0087313
Permit Type:	Renewal
Issued:	9/6/2011
Effective:	9/6/2011
Expiration:	9/6/2016

Ohio | Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
UNION TANK CAR CO.

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Authorization

Facility ID: 0351010025
Application Number(s): A0018269
Permit Number: P0087313
Permit Description: Renewal PTIO for emissions units K001 (paint booth w/oven), P002 (rail car vapor flare), P003 (interior grit blast), and P005 (exterior grit blast).
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 9/6/2011
Effective Date: 9/6/2011
Expiration Date: 9/6/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

UNION TANK CAR CO.
939 HOLLAND AVE
MARION, OH 43302

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

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0087313
Permit Description: Renewal PTIO for emissions units K001 (paint booth w/oven), P002 (rail car vapor flare), P003 (interior grit blast), and P005 (exterior grit blast).

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

Emissions Unit ID:	**K001**
Company Equipment ID:	Paint booth w/oven
Superseded Permit Number:	03-16262
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Ammonia, HC, and VCM Tank Car flare
Superseded Permit Number:	03-16262
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	Interior grit blast
Superseded Permit Number:	03-4521
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	Exterior grit blast booth w/baghouse
Superseded Permit Number:	03-16104
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. K001, Paint booth w/oven

Operations, Property and/or Equipment Description:

Paint spray booth with dry filtration

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

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

a. d)(4), d)(5) and d)(6).

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

a. b)(1)b., b(2)b., c(1), d)(1), d)(2), d)(3), e)(3), f)(1)e., f)(1)f. and f)(1)g.

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)	Emissions of volatile organic compounds (VOC) shall not exceed 17.5 pounds per hour from the coating operations. Emissions of VOC shall not exceed 751.7 pounds per month and 4.51 tons per year from the cleanup operations. See b)(2)a.
b.	OAC rule 3745-31-05(D)	Emissions of VOC shall not exceed 52.50 tonsper rolling, 12-month period from the coating operations. Emissions of hazardous air pollutants (HAPs), from emissions units K001 and P002, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b. and c)(1).
c.	OAC rule 3745-21-09(U)(1)(d)	Emissions of VOC shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d) and OAC rule 3745-31-05(D).

b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 52.50 tons VOC per rolling 12-month period based on coating usage restrictions [see c)(1)] and a maximum coating VOC content of 3.5 lbs/gal established by OAC rule 3745-21-09(U)(1)(d); and

ii. Annual HAP emissions from emissions units K001 and P002 combined shall not exceed 9.90 tons per rolling 12-month period for any individual HAP and 24.90 tons per rolling 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

c) Operational Restrictions

(1) The maximum annual coating usage rate for this emissions unit shall not exceed 30,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates. The permittee shall use existing records to determine compliance upon commencing operation under the provisions of this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all coatings employed in this emissions unit:

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

b. the VOC content of each coating, as applied, in pounds per gallon;

c. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied;

d. the amount of each individual HAP in each coating, in pounds per gallon, as applied;

e. the number of gallons of each coating employed;

f. the total number of gallons of all coatings employed [summation of d)(1)e.];

g. the annual coating usage, in gallons, for all coatings employed, based upon a rolling 12-month summation of the monthly usage rates;

h. the VOC emission rate for each coating [d)(1)b. x d)(1)e.], in pounds;

i. the total VOC emission rate for all coatings [summation of d)(1)h.], in pounds or tons

j. the annual VOC emissions, in tons, from all coatings, based upon a rolling 12-month summation of the monthly VOC emissions

k. the emission rate for each individual HAP from each coating employed [d)(1)d. x d)(1)e.], in pounds per month;

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

(2) The permittee shall collect and record the following each month for cleanup operations:

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

b. the VOC content of each cleanup material employed, in pounds per gallon;

c. the amount of each individual HAP in each cleanup material employed, in pounds per gallon;

d. the number of gallons of each cleanup material employed;

e. the VOC emissions from each cleanup material employed [d)(2)b. x d)(2)d.], in pounds;

f. the total VOC emissions from all cleanup materials employed [summation of d)(2)e.], in pounds or tons;

g. the annual year to date VOC emissions from cleanup operations, in tons per year [summation of d)(2)f. for each calendar month to date from January to December]; and

h. the emission rate for each individual HAP from each cleanup material employed [d)(2)c. x d)(2)d.], in pounds per month.

(3) The permittee shall collect and record the following HAP information each month for emission units K001 and P002 combined:

a. the total emission rate for each individual HAP from all coatings and cleanup materials employed in emissions unit K001 and individual HAP emitted from emissions unit P002 (rail car cleaning operation with flare), in pounds per month (summation of the individual HAPs quantified in d)(1)k., d)(2)h. and from emissions unit P002*);

*Quantification of HAP emissions from the railcar cleaning operation are required in the monitoring and recordkeeping section of the permit for emissions unit P002.

b. the total HAP emission rate for all HAPs combined from all coatings and cleanup materials employed in emissions unit K001 and total HAPs emitted from emissions unit P002 [summation of all individual HAPs quantified in d)(3)a.], in tons per month; and

c. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of monthly HAP emissions.

(4) The Permit to Install for emissions units K001 and P002 was evaluated based on the actual materials (typically coatings and cleanup 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 these emission units using data from the Permit to Install application and the Screen3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the Screen3 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):

a. Pollutant: methyl isobutyl ketone
TLV (µg/m3): 204,826
Maximum Hourly Emission Rate (lbs/hr): 2.05
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 2545
MAGLC (µg/m3): 4877

b. Pollutant: toluene
TLV (µg/m3): 188,405
Maximum Hourly Emission Rate (lbs/hr): 0.54
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 676
MAGLC (µg/m3): 4486

c. Pollutant: diethylene glycol monomethyl ether
TLV (µg/m3): 96,663
Maximum Hourly Emission Rate (lbs/hr): 1.75
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 2177
MAGLC (µg/m3): 2302

d. Pollutant: ethylene glycol monobutyl ether acetate
TLV (µg/m3): 131,043
Maximum Hourly Emission Rate (lbs/hr): 1.68
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 2088
MAGLC (µg/m3): 3120

e. Pollutant: xylene
TLV (µg/m3): 434,192
Maximum Hourly Emission Rate (lbs/hr): 2.68
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 3320
MAGLC (µg/m3): 10,338

f. Pollutant: MEK
TLV (µg/m3): 589,775
Maximum Hourly Emission Rate (lbs/hr): 1.17
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 1461
MAGLC (µg/m3): 14,042

g. Pollutant: propylene glycol monomethyl ether
TLV (µg/m3): 368,589
Maximum Hourly Emission Rate (lbs/hr): 0.25
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 310.7
MAGLC (µg/m3): 8776

h. Pollutant: lead
TLV (µg/m3): 50
Maximum Hourly Emission Rate (lbs/hr): 0.23
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 0.1714
MAGLC (µg/m3): 1.19

(5) 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 (typically for coatings or cleanup materials), 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.).

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 contaminantnot 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.

(6) 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.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

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

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

i. 52.50 tons of VOC per rolling, 12-month period;

ii. the maximum annual coating usage rate of 30,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates;

iii. the 9.90 tons per rolling, 12-month period for any individual HAP; and

iv. the24.90 tons per rolling, 12-month period for any combination of HAPs.

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

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

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

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

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

(3) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (coating that exceeds the 3.50 lbs of VOC/gallon excluding water and exempt solvents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

Emissions of VOC shall not exceed 17.5 pounds per hour from the coating operations.

<u>Applicable Compliance Method:</u>

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 5.0 gallons per hour and a maximum VOC content of 3.50 pounds per gallon.

b. <u>Emission Limitations:</u>

Emissions of VOC shall not exceed 751.7 pounds per month and 4.51 tons per year from the cleanup operations.

Applicable Compliance Method:

Compliance with the above emission limitationsshall be based upon the recordkeeping requirements specified in section d)(2).

c. Emission Limitation:

Emissions of VOC shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in section d)(1). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

d. Emission Limitation:

Emissions of VOC shall not exceed 52.50 tons per rolling, 12-month period from the coating operations.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in section d)(1).

e. Emission Limitations:

Emissions of HAPs, from emissions units K001 and P002, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in section d)(3).

f. Emission Limitation:

The maximum annual coating usage rate for this emissions unit shall not exceed 30,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in section d)(1).

g) Miscellaneous Requirements

(1) None.

2. P002, Ammonia, HC, and VCM Tank Car flare

Operations, Property and/or Equipment Description:

Rail car cleaning operation with flare

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

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

a. d)(4), d)(5) and d)(6).

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

a. b)(1)b., b)(2)c., c)(1), d)(1), d)(2), d)(3), e)(2), f)(1)a., f)(1)b., and f)(1)c.

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)	Control Requirements, see b)(2)a., b)(2)b. and c)(3).
b.	OAC rule 3745-31-05(D)	Emissions of volatile organic compounds (VOC) shall not exceed 20.56 tons per rolling 12-month period Emissions of hazardous air pollutants (HAPs), from emissions units K001 and P002 combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs. See b)(2)c. and c)(1).

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of a flare with 98% destruction efficiency.

b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).

c. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 20.56 tons VOC per rolling 12-month period based on the amount of VOC material processed. [See c)(1)]

ii. Annual HAP emissions from emissions units K001 and P002 combined shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.

c) Operational Restrictions

(1) The maximum annual amount of VOC materials that can be processed by this emission unit shall not exceed 2,056,426.67 pounds, based upon a rolling, 12-month summation of the VOC materials processed. The permittee shall use existing records to determine compliance upon commencing operation under the provisions of this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

(2) A pilot flame shall be maintained in the flare's pilot light burner during rail car cleaning operations.

(3) The flare shall be designed for and operated with no visible emissions, except for periods of time not to exceed a total of 5 minutes during any 2 consecutive hours.

d) Monitoring and/or Recordkeeping Requirements

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

a. the amount of VOC materials processed; in pounds; and

b. the rolling, 12-month summation of the amount of VOC materials processed.

(2) The permittee shall collect and record the following information each month:

a. the name and identification number of each material flared;

b. the amount of each VOC material flared, in pounds;

c. the amount of each individual HAP in each material flared, in pound HAP/pound of VOC material flared;

d. the total amount of all VOC materials flared, in pounds;

e. the VOC emission rate for each material flared, in tons, using the following equation: [d(2)b. x (1-0.98*)];

*The destruction efficiency of flare

f. the total VOC emission rate for all materials flared [summation of d)(2)e.], in tons;

g. the annual VOC emissions from all materials flared, based upon a rolling 12-month summation of the monthly VOC emissions; and

h. the emission rate for each individual HAP from each material flared [d)(2)c. x d)(2)d.], in lbs/month.

(3) The permittee shall collect and record the following HAP information each month for emission units K001 and P002 combined:

a. the total emission rate for each individual HAP from all rail car materials flared and emitted from emissions unit K001 (Paint spray booth), in pounds per month [summation of the individual HAPs quantified in d)(2)h. and from emissions unit K001*];

*Quantification of HAP emissions from the paint spray booth is required in the monitoring and recordkeeping section of the permit for emissions unit K001.

b. the total HAP emission rate for all HAPs combined from all rail car materials flared and emitted from emissions unit K001 [summation of all individual HAPs quantified in d)(3)a.], in tons/month; and

c. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of monthly emissions.

(4) The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device shall be installed, calibrated, operated and maintained in accordance with the manufacturer’s recommendations, instructions and operating manuals.

The permittee shall record the following information each day:

a. All periods during which there was no pilot flame.

b. The operating times for the flare, monitoring equipment, and the associated emissions unit.

(5) The Permit to Install for emissions units K001 and P002 was evaluated based on the actual materials (typically coatings and cleanup 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 these emission units using data from the Permit to Install application and the Screen3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the Screen3 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):

a. Pollutant: methyl isobutyl ketone
TLV (µg/m3): 204,826
Maximum Hourly Emission Rate (lbs/hr): 2.05
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 2545
MAGLC (µg/m3): 4877

b. Pollutant: toluene
TLV (µg/m3): 188,405
Maximum Hourly Emission Rate (lbs/hr): 0.54
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 676
MAGLC (µg/m3): 4486

c. Pollutant: diethylene glycol monomethyl ether
TLV (µg/m3): 96,663
Maximum Hourly Emission Rate (lbs/hr): 1.75
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 2177
MAGLC (µg/m3): 2302

d. Pollutant: ethylene glycol monobutyl ether acetate
TLV (µg/m3): 131,043
Maximum Hourly Emission Rate (lbs/hr): 1.68
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 2088
MAGLC (µg/m3): 3120

e. Pollutant: xylene
TLV (µg/m3): 434,192
Maximum Hourly Emission Rate (lbs/hr): 2.68
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 3320
MAGLC (µg/m3): 10,338

f. Pollutant: MEK
TLV (µg/m3): 589,775
Maximum Hourly Emission Rate (lbs/hr): 1.17
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 1461
MAGLC (µg/m3): 14,042

g. Pollutant: propylene glycol monomethyl ether
TLV (µg/m3): 368,589
Maximum Hourly Emission Rate (lbs/hr): 0.25
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 310.7
MAGLC (µg/m3): 8776

h. Pollutant: lead
TLV (µg/m3): 50
Maximum Hourly Emission Rate (lbs/hr): 0.23
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 0.1714
MAGLC (µg/m3): 1.19

(6) 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 (typically for coatings or cleanup materials), 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.).

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" underOAC 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.

(7) 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.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

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

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

i. 20.56 tons VOC per rolling 12-month period;

ii. the maximum annual VOC materials processed not to exceed 2,056,426.67 pounds, based upon a rolling, 12-month summation of the VOC materials processed monthly.

iii. the 9.90 tons per rolling, 12-month period for any individual HAP; and

iv. the 24.90 tons per rolling, 12-month period for any combination of HAPs.

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

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

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

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

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

(3) The permittee shall submit deviation (excursion) reports that identify all periods during which the pilot flame was not functioning properly. The reports shall include the date, time, and duration of each such period.

Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

Emissions of VOC shall not exceed 20.56 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in section d)(2).

b. Emission Limitation:

Emissions of HAPs, from emissions units K001 and P002, combined, shall not exceed 9.90 tons per rolling 12-month period for any individual HAP or 24.90 tons per rolling 12-month period for any combination of HAPs.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in section d)(3).

c. Emission Limitation:

The maximum annual amount of VOC materials that can be processed by this emissions unit shall not exceed 2,056,426.67 pounds, based upon a rolling, 12-month summation of the VOC materials processed.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements in section d)(1).

d. Emission Limitation:

The flare shall be designed for and operated with no visible emissions, except for periods of time not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with 40 CFR Part 60, Appendix A - Method 22.

g) Miscellaneous Requirements

(1) None.

3. P003, Interior grit blast

Operations, Property and/or Equipment Description:

Interior of rail road tank cars are grit blasted to prepare the interior for recoating at other shops

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.31 pound per hour and 1.36 tons per year.
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	Visible PE from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

b. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 6.0 inches of water.

(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 weekly 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 an administrative modification.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

PE shall not exceed 0.31 pound per hour and 1.36 tons per year.

<u>Applicable Compliance Method:</u>

If required, the permittee shall demonstrate compliance with the hourly emission limitation by emission testing conducted in accordance with US EPA test methods 1-5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 pounds per ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

b. <u>Emission Limitation:</u>

Visible PE from the stack(s) serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

<u>Applicable Compliance Method:</u>

If required, compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.

4. P005, Exterior grit blast booth w/baghouse

Operations, Property and/or Equipment Description:

Shot blast machine with baghouse

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 2.30 pounds per hour and 10.10 tons per year. There shall be no visible emissions of fugitive dust emitted from this emissions unit and/or the area immediately above the capture system serving this emissions unit. Control Requirements [See b)(2)a.]
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of a baghouse with a maximum outlet concentration of 0.01 gr/dscf.

b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 6.0 inches of water.

(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 weekly 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 an administrative modification.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

PE shall not exceed 2.30 pounds per hour and 10.10 tons per year.

<u>Applicable Compliance Method:</u>

The hourly emission limitation was established by multiplying the outlet concentration of 0.01 gr PE/dscf by the maximum volumetric air flow of 26,900 acfm and applying the conversion factors of 7000 grains per pound, 1 dscf/1 acfm and 60 minutes per hour. If required, the permittee shall demonstrate compliance with the hourly emission limitation by emission testing conducted in accordance with US EPA test methods 1-5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours per year and applying the conversion factor of 2000 pounds per ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:

There shall be no visible emissions from this emissions unit and/or the area immediately above the capture system serving this emissions unit.

Applicable Compliance Method:

Compliance with the visible emissions limitation shall be determined in accordance with U.S. EPA Method 22.

g) Miscellaneous Requirements

(1) None.