☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **14-05459**

A. Source Description

Patheon Pharmeceuticals, Inc., manufactures pharmaceutical products. This permit application is for four existing granulation drying ovens for the dry products manufacturing area of the facility. The ovens are controlled with fabric filters and wet scrubbers, which will be added as a result of this permit. These ovens are used to dry wet granulation material during the manufacture of pharmaceutical tablets.

B. Facility Emissions and Attainment Status

Patheon Pharmeceuticals, Inc. is a major stationary source based on potential HAP emissions for purposes of Title V applicability. The facility is located in Hamilton County which is designated a non-attainment area for Ozone and an attainment area for all other NAAQS pollutants.

C. Source Emissions

Potential particulate emissions and organic emissions were calculated based upon facility supplied maximum emissions and annual production data. Potential particulate emissions without controls are 40 TPY per oven or 160.0 TPY for the four ovens. Uncontrolled potential organic emissions are 60.0 TPY per oven or 240.0 TPY for the four ovens. The potential HAP emissions from these emissions unit are greater than 9.9 TPY of any individual HAP and 24.9 TPY of combined HAPs. The proposed additional terms and conditions will limit the HAP emissions to less than 9.9 TPY of any individual HAP and 24.9 TPY of combined HAPs, the particulate emissions to 0.04 TPY per oven and the organic emissions to 6.0 TPY per oven. The permittee will maintain monthly records and submit annual reports to demonstrate compliance with the limits.

D. Conclusion

With this modification, the federally enforceable terms and conditions in this permit to install will limit the HAP emissions to less than 10 TPY for any single HAP and less than 25 TPY for combined HAPs. The permit will also limit the amount of organic solvent used to keep the emissions below major source threshold levels. Because the allowable OC emissions are less than the 100 TPY, major stationary source trigger emissions level, the permittee will not be subject to the requirements of the Emissions Offset Policy. Also the HAP emissions will be limited to 9.9 TPY for any individual HAP and 24.9 TPY for combined HAPs, thus the facility will be exempt from the MACT requirements.

OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: DRAFT PERMIT TO INSTALL
HAMILTON COUNTY
Application No: 14-05459

DATE: 7/15/2003

CERTIFIED MAIL

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Patheon Pharmaceuticals, Inc.
Teresa Turnbow
2110 Galbraith Road
Cincinnati, OH 452156300

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA HCDES Ohio-Kentucky-Indiana Regional Council of Governments KY IN

HAMILTON COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **14-05459** FOR AN AIR CONTAMINANT SOURCE FOR
PATHEON PHARMACEUTICALS, INC.

On 7/15/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Patheon Pharmaceuticals, Inc.**, located at **2110 East Galbraith Road, Cincinnati**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05459:

Modification of four granulation drying ovens to increase emissions and add two wet scrubbers.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Harry Schweitering, Hamilton County Department of Environmental Services, 250 William Howart Taft Pkwy, Cincinnati, OH 45219-2660 [(513)946-7777]

DRAFT PERMIT TO INSTALL 14-05459

Application Number: 14-05459

APS Premise Number: 1431380503

Permit Fee: **To be entered upon final issuance**

Name of Facility: Patheon Pharmaceuticals, Inc.

Person to Contact: Teresa Turnbow

Address: 2110 Galbraith Road
Cincinnati, OH 452156300

Location of proposed air contaminant source(s) [emissions unit(s)]:
2110 East Galbraith Road
Cincinnati, **Ohio**

Description of proposed emissions unit(s):
Modification of four granulation drying ovens to increase emissions and add two wet scrubbers.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

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

3. Records Retention Requirements

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.

4. 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.

5. 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).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

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

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
OC	24.0
PM/PM10	0.16

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P044 - granulation drying oven TG-81 with fabric filter and wet scrubber - modification	OAC rule 3745-31-05(A)(3)	0.01 lb/hr and 0.04 TPY PM/PM10* 9.5 lbs OC/hr* and 33 lbs OC/day** when employing nonphotochemically reactive materials. *The hourly and annual emission limitations for PM/PM10 and the hourly non-photochemically reactive OC limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits. ** this emissions unit is a batch operation and the daily emissions are based on the worst case batch employed in this emission unit. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), 3745-21-07(G)(2), and OAC rule 3745-31-05(D). 8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average,

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	except as specified by rule.
OAC rule 3745-17-11(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).
OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-31-05(D)	See terms A.2.c and B.4 6.0 TPY OC***, based on a rolling, 12-month summation. ***for purposes of determining the applicability of whether or not this permitting action would be considered a major stationary source subject to Emissions Offset Policy, all VOC emissions are considered to be OC.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by emissions limitations, the use of a HEPA filter with a control efficiency of at least 99.9 percent for particulate emissions, the use of a wet scrubber with a control efficiency of at least 90 percent when non-photochemically reactive material is employed, and compliance with the Ohio EPA Air Toxics Policy.

2.b The permittee shall control non-photochemically reactive material OC emissions from this emissions unit by use of a wet scrubber capable of maintaining an minimum overall OC control efficiency of 90% by weight. The requirement to use a wet scrubber does not apply when the permittee does not use any organic compounds as wetting agents or when employing photochemically reactive material as long as the permittee meets the mass emissions limitations listed in A.1 above.

2.c The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation. The permittee has

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existing records to demonstrate compliance with the rolling, 12-month summation limitation.

2.d The maximum organic compound solvent content per batch shall not exceed 220 pounds/batch.

B. Operational Restrictions

1. The scrubber water supply pressure shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.

2. The scrubber water flow rate shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.

3. The operation of the control equipment outside of the restrictions established in the Special Terms and Conditions may or may not indicate a mass emission violation. If required by the Ohio EPA, compliance with the mass emission limitations shall be determined by performing concurrent mass emission tests and parameter readings, using US EPA-approved methods and procedures. The results of any required emission tests and parameter readings shall be used in determining whether or not the operation of the control equipment outside of the restrictions specified in the Special Terms and Conditions is indicative of a possible violation of the mass emission limitations.

4. The maximum annual organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

   The permittee has existing records to demonstrate compliance with this term upon issuance of this permit.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the scrubber water supply pressure and scrubber water flow rate while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with deviations as deemed necessary by the permittee.

   The permittee shall collect and record the following information each day that the emissions unit is operating:

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a. The scrubber water flow rate, in gallons per minute.

b. The scrubber water supply pressure, in psig.

c. A log of the operating time for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

d. The position of the by-pass valve, indicating whether the exhaust stream from the ovens is going to the wet scrubbers.

2. On any day that any photochemically reactive material [as identified in OAC rule 3745-21-01(C)(5)] is employed, the permittee shall collect and record the following information:

a. The company identification of each organic solvent material employed.

b. The total amount of organic solvent material employed, in pounds.

c. The total organic compound emissions from all organic solvents employed, in pounds

d. The total number of hours of operation.

e. The average hourly organic compound emission rate for all organic solvents employed, (c/d), in pounds per hour (average).

3. The permittee shall maintain monthly records of following information:

a. The organic solvent usage rate for each month, in pounds.

b. The rolling, 12-month summation of the organic solvent usage rate, in pounds.

4. The permittee shall collect and record the following information each month:

a. The number of batches made during the month.

b. The OC solvent content of each batch, in pounds per batch.

c. An identification of whether the OC content of the material employed is photochemically reactive material,

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d. The total amount of non-PRM solvent sprayed during the month, in pounds.

e. The total amount of PRM solvent sprayed during the month, in pounds.

f. The monthly OC emissions calculated as follows for non-PRM materials:
Monthly OC emissions (lbs/month)
= total solvent sprayed during the month (pounds) * (1- the control efficiency determined during the most recent performance test)

g. The monthly OC emissions calculated as follows for PRM materials:
Monthly OC emissions (lbs/month)
= total solvent sprayed during the month (pounds)

h. The total monthly OC emissions calculated for non-PRM materials and PRM materials (f+g), in lbs/month.

i. The rolling, 12-month OC emission rate in tons per year

These records shall be summarized at the end of each calendar year to determine the annual OC emissions.

5. The permit to install for this emissions unit 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 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (ug/m3): 1,884,254

Maximum Hourly Emission Rate (lbs/hr): 38.0 (Emissions units P044 - P047, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,423

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MAGLC (ug/m3): 44,863

Pollutant: Isopropanol

TLV (ug/m3): 983,067

Maximum Hourly Emission Rate (lbs/hr): 38.0 (Emissions units P044 - P047, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,423

MAGLC (ug/m3): 23,406

Physical changes to or 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 Toxics 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 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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], 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 satisfy the Air Toxic Policy:"

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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. when the 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.

6. The permittee shall collect and record the following information each month for the entire facility:

a. The name and identification of each HAP employed.

b. The amount of each HAP employed, in pounds.

c. The total individual HAP emissions from each individual HAP employed, in pounds or tons per month.

d. The total combined HAP emissions from all HAPs employed, in pounds or tons per month.

e. The updated rolling, 12-month summation of emissions for each individual HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

f. The updated rolling, 12-month summation of emissions for the total combined HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to ne kept on an emission unit - by- emission unit basis.

7. The permittee shall maintain daily records of any day when nonphotochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.

D. Reporting Requirements

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

a. All periods of time during which the following scrubber parameters were not maintained at or above the required levels:

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i. The scrubber water flow rate.

ii. The scrubber water supply pressure.

b. All exceedances of the updated rolling, 12- month summation of the organic solvent usage rate and the updated rolling, 12-month OC emissions limitations.

c. All exceedances of the HAP usage limitations set forth in term A.2.c.

d. Each day during which a photochemically reactive material was employed where the OC emission rate exceeded 8 pounds per hour and/or 40 pounds per day.

e. Any day non-photochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.

2. These quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the organic solvent content limit per batch set forth in term A.2.d. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period then a report is required stating so.

4. The permittee shall submit annual PM/PM10 and OC emissions reports.

5. These annual reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emission limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

2. Emission limitation:

0.01 lb PM/PM10/hr and 0.04 TPY

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Applicable Compliance Method:
Compliance shall be determined utilizing the total dry material throughput (in lbs/hr) multiplied by the minimum HEPA control efficiency of 99.97%. The hourly number is then multiplied by 8760 hours per year and divided by 2000 lbs/ton.

3. Emission limitation :
9.5 lbs OC/hr

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

a. The emission testing shall be conducted within three months of startup of the emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate and overall control efficiency for OC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for OC, Method 25 of 40 CFR Part 60, Appendix A- if applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

d. 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.

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" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95". The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit

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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.

4. Emission limitation:

   6.0 TPY OC based on a rolling, 12-month summation

   Applicable Compliance Method:

   Compliance shall be determined by the record keeping in term C.4.

5. Emission limitation:

   8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials.

   Applicable Compliance Method:

   Compliance shall be determined by the record keeping in term C.2.

6. Emission limitation:

   The maximum annual organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

   Applicable Compliance Method:

   Compliance shall be determined by the record keeping in term C.3.

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7. Emission limitation:

   9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs

   Applicable Compliance Method:

   Compliance shall be determined by the record keeping in term C.6.

8. Emission limitation:

   The maximum organic compound solvent content per batch shall not exceed 220 pounds/batch.

   Applicable Compliance Method:

   Compliance shall be determined by the record keeping in term C.4.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1 - C.4, C.6. C.7., D. and E.

2. The terms and conditions in this permit to install shall supersede Permit to Install 14-03855 issued on October 18, 2002 for this emissions unit

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P045 - granulation drying oven TG-82 with fabric filter and wet scrubber - modification	OAC rule 3745-31-05(A)(3)	0.01 lb/hr and 0.04 TPY PM/PM10* 9.5 lbs OC/hr* and 33 lbs OC/day** when employing nonphotochemically reactive materials. *The hourly and annual emission limitations for PM/PM10 and the hourly non-photochemically reactive OC limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits. ** this emissions unit is a batch operation and the daily emissions are based on the worst case batch employed in this emission unit. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), 3745-21-07(G)(2), and OAC rule 3745-31-05(D). 8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average,

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	except as specified by rule.
OAC rule 3745-17-11(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).
OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-31-05(D)	See terms A.2.c and B.4 6.0 TPY OC***, based on a rolling, 12-month summation. ***for purposes of determining the applicability of whether or not this permitting action would be considered a major stationary source subject to Emissions Offset Policy, all VOC emissions are considered to be OC.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by emissions limitations, the use of a HEPA filter with a control efficiency of at least 99.9 percent for particulate emissions, the use of a wet scrubber with a control efficiency of at least 90 percent when non-photochemically reactive material is employed, and compliance with the Ohio EPA Air Toxics Policy.

2.b The permittee shall control non-photochemically reactive material OC emissions from this emissions unit by use of a wet scrubber capable of maintaining an minimum overall OC control efficiency of 90% by weight. The requirement to use a wet scrubber does not apply when the permittee does not use any organic compounds as wetting agents or when employing photochemically reactive material as long as the permittee meets the mass emissions limitations listed in A.1 above.

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2.c The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limitation.

2.d The maximum organic compound solvent content per batch shall not exceed 220 pounds/batch.

B. Operational Restrictions

1. The scrubber water supply pressure shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.

2. The scrubber water flow rate shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.

3. The operation of the control equipment outside of the restrictions established in the Special Terms and Conditions may or may not indicate a mass emission violation. If required by the Ohio EPA, compliance with the mass emission limitations shall be determined by performing concurrent mass emission tests and parameter readings, using US EPA-approved methods and procedures. The results of any required emission tests and parameter readings shall be used in determining whether or not the operation of the control equipment outside of the restrictions specified in the Special Terms and Conditions is indicative of a possible violation of the mass emission limitations.

4. The maximum annual organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

   The permittee has existing records to demonstrate compliance with this term upon issuance of this permit.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the scrubber water supply pressure and scrubber water flow rate while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with deviations as deemed necessary by the permittee.

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The permittee shall collect and record the following information each day that the emissions unit is operating:

a. The scrubber water flow rate, in gallons per minute.

b. The scrubber water supply pressure, in psig.

c. A log of the operating time for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

d. The position of the by-pass valve, indicating whether the exhaust stream from the ovens is going to the wet scrubbers.

2. On any day that any photochemically reactive material [as identified in OAC rule 3745-21-01(C)(5)] is employed, the permittee shall collect and record the following information:

a. The company identification of each organic solvent material employed.

b. The total amount of organic solvent material employed, in pounds.

c. The total organic compound emissions from all organic solvents employed, in pounds

d. The total number of hours of operation.

e. The average hourly organic compound emission rate for all organic solvents employed, (c/d), in pounds per hour (average).

3. The permittee shall maintain monthly records of following information:

a. The organic solvent usage rate for each month, in pounds.

b. The rolling, 12-month summation of the organic solvent usage rate, in pounds.

4. The permittee shall collect and record the following information each month:

a. The number of batches made during the month.

b. The OC solvent content of each batch, in pounds per batch.

c. An identification of whether the OC content of the material employed is photochemically reactive material,

d. The total amount of non-PRM solvent sprayed during the month, in pounds.

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e. The total amount of PRM solvent sprayed during the month, in pounds.

f. The monthly OC emissions calculated as follows for non-PRM materials:
Monthly OC emissions (lbs/month)
= total solvent sprayed during the month (pounds) * (1- the control efficiency determined during the most recent performance test)

g. The monthly OC emissions calculated as follows for PRM materials:
Monthly OC emissions (lbs/month)
= total solvent sprayed during the month (pounds)

h. The total monthly OC emissions calculated for non-PRM materials and PRM materials (f+g), in lbs/month.

i. The rolling, 12-month OC emission rate in tons per year

These records shall be summarized at the end of each calendar year to determine the annual OC emissions.

5. The permit to install for this emissions unit 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 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (ug/m3): 1,884,254

Maximum Hourly Emission Rate (lbs/hr): 38.0 (Emissions units P044 - P047, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,423

MAGLC (ug/m3): 44,863

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Pollutant: Isopropanol

TLV (ug/m3): 983,067

Maximum Hourly Emission Rate (lbs/hr): 38.0 (Emissions units P044 - P047, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,423

MAGLC (ug/m3): 23,406

Physical changes to or 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 Toxics 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 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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], 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 satisfy the Air Toxic Policy:"

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

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

c. when the 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.

6. The permittee shall collect and record the following information each month for the entire facility:

a. The name and identification of each HAP employed.

b. The amount of each HAP employed, in pounds.

c. The total individual HAP emissions from each individual HAP employed, in pounds or tons per month.

d. The total combined HAP emissions from all HAPs employed, in pounds or tons per month.

e. The updated rolling, 12-month summation of emissions for each individual HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

f. The updated rolling, 12-month summation of emissions for the total combined HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to ne kept on an emission unit - by- emission unit basis.

7. The permittee shall maintain daily records of any day when nonphotochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.

D. Reporting Requirements

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

a. All periods of time during which the following scrubber parameters were not maintained at or above the required levels:

i. The scrubber water flow rate.

ii. The scrubber water supply pressure.

b. All exceedances of the updated rolling, 12- month summation of the organic solvent usage rate and the updated rolling, 12-month OC emissions limitations.

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c. All exceedances of the HAP usage limitations set forth in term A.2.c.

d. Each day during which a photochemically reactive material was employed where the OC emission rate exceeded 8 pounds per hour and/or 40 pounds per day.

e. Any day non-photochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.

2. These quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the organic solvent content limit per batch set forth in term A.2.d. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period then a report is required stating so.

4. The permittee shall submit annual PM/PM10 and OC emissions reports.

5. These annual reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emission limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

2. Emission limitation:

0.01 lb PM/PM10/hr and 0.04 TPY

Applicable Compliance Method:
Compliance shall be determined utilizing the total dry material throughput (in lbs/hr) multiplied by the minimum HEPA control efficiency of 99.97%. The hourly number is then multiplied by 8760 hours per year and divided by 2000 lbs/ton.

3. Emission limitation :
9.5 lbs OC/hr

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

a. The emission testing shall be conducted within three months of startup of the emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate and overall control efficiency for OC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for OC, Method 25 of 40 CFR Part 60, Appendix A- if applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

d. 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.

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" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95". The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the 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.

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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.

4. Emission limitation:

   6.0 TPY OC based on a rolling, 12-month summation

   Applicable Compliance Method:

   Compliance shall be determined by the record keeping in term C.4.

5. Emission limitation:

   8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials.

   Applicable Compliance Method:

   Compliance shall be determined by the record keeping in term C.2.

6. Emission limitation:

   The maximum annual organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

   Applicable Compliance Method:

   Compliance shall be determined by the record keeping in term C.3.

7. Emission limitation:

   9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs

   Applicable Compliance Method:

   Compliance shall be determined by the record keeping in term C.6.

8. Emission limitation:

   The maximum organic compound solvent content per batch shall not exceed 220 pounds/batch.

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Applicable Compliance Method:

Compliance shall be determined by the record keeping in term C.4.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1 - C.4, C.6. C.7., D. and E.

2. The terms and conditions in this permit to install shall supersede Permit to Install 14-03855 issued on October 18, 2002 for this emissions unit

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P046 - granulation drying oven TG-83 with fabric filter and wet scrubber - modification	OAC rule 3745-31-05(A)(3)	0.01 lb/hr and 0.04 TPY PM/PM10* 9.5 lbs OC/hr* and 33 lbs OC/day** when employing nonphotochemically reactive materials. *The hourly and annual emission limitations for PM/PM10 and the hourly non-photochemically reactive OC limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits. ** this emissions unit is a batch operation and the daily emissions are based on the worst case batch employed in this emission unit. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), 3745-21-07(G)(2), and OAC rule 3745-31-05(D). 8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average,

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	except as specified by rule.
OAC rule 3745-17-11(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).
OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-31-05(D)	See terms A.2.c and B.4 6.0 TPY OC***, based on a rolling, 12-month summation. ***for purposes of determining the applicability of whether or not this permitting action would be considered a major stationary source subject to Emissions Offset Policy, all VOC emissions are considered to be OC.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by emissions limitations, the use of a HEPA filter with a control efficiency of at least 99.9 percent for particulate emissions, the use of a wet scrubber with a control efficiency of at least 90 percent when non-photochemically reactive material is employed, and compliance with the Ohio EPA Air Toxics Policy.

2.b The permittee shall control non-photochemically reactive material OC emissions from this emissions unit by use of a wet scrubber capable of maintaining an minimum overall OC control efficiency of 90% by weight. The requirement to use a wet scrubber does not apply when the permittee does not use any organic compounds as wetting agents or when employing photochemically reactive material as long as the permittee meets the mass emissions limitations listed in A.1 above.

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2.c The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limitation.

2.d The maximum organic compound solvent content per batch shall not exceed 220 pounds/batch.

B. Operational Restrictions

1. The scrubber water supply pressure shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.

2. The scrubber water flow rate shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.

3. The operation of the control equipment outside of the restrictions established in the Special Terms and Conditions may or may not indicate a mass emission violation. If required by the Ohio EPA, compliance with the mass emission limitations shall be determined by performing concurrent mass emission tests and parameter readings, using US EPA-approved methods and procedures. The results of any required emission tests and parameter readings shall be used in determining whether or not the operation of the control equipment outside of the restrictions specified in the Special Terms and Conditions is indicative of a possible violation of the mass emission limitations.

4. The maximum annual organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

   The permittee has existing records to demonstrate compliance with this term upon issuance of this permit.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the scrubber water supply pressure and scrubber water flow rate while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with deviations as deemed necessary by the permittee.

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The permittee shall collect and record the following information each day that the emissions unit is operating:

a. The scrubber water flow rate, in gallons per minute.

b. The scrubber water supply pressure, in psig.

c. A log of the operating time for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

d. The position of the by-pass valve, indicating whether the exhaust stream from the ovens is going to the wet scrubbers.

2. On any day that any photochemically reactive material [as identified in OAC rule 3745-21-01(C)(5)] is employed, the permittee shall collect and record the following information:

a. The company identification of each organic solvent material employed.

b. The total amount of organic solvent material employed, in pounds.

c. The total organic compound emissions from all organic solvents employed, in pounds

d. The total number of hours of operation.

e. The average hourly organic compound emission rate for all organic solvents employed, (c/d), in pounds per hour (average).

3. The permittee shall maintain monthly records of following information:

a. The organic solvent usage rate for each month, in pounds.

b. The rolling, 12-month summation of the organic solvent usage rate, in pounds.

4. The permittee shall collect and record the following information each month:

a. The number of batches made during the month.

b. The OC solvent content of each batch, in pounds per batch.

c. An identification of whether the OC content of the material employed is photochemically reactive material,

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d. The total amount of non-PRM solvent sprayed during the month, in pounds.

e. The total amount of PRM solvent sprayed during the month, in pounds.

f. The monthly OC emissions calculated as follows for non-PRM materials:
Monthly OC emissions (lbs/month)
= total solvent sprayed during the month (pounds) * (1- the control efficiency determined during the most recent performance test)

g. The monthly OC emissions calculated as follows for PRM materials:
Monthly OC emissions (lbs/month)
= total solvent sprayed during the month (pounds)

h. The total monthly OC emissions calculated for non-PRM materials and PRM materials (f+g), in lbs/month.

i. The rolling, 12-month OC emission rate in tons per year

These records shall be summarized at the end of each calendar year to determine the annual OC emissions.

5. The permit to install for this emissions unit 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 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (ug/m3): 1,884,254

Maximum Hourly Emission Rate (lbs/hr): 38.0 (Emissions units P044 - P047, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,423

MAGLC (ug/m3): 44,863

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Pollutant: Isopropanol

TLV (ug/m3): 983,067

Maximum Hourly Emission Rate (lbs/hr): 38.0 (Emissions units P044 - P047, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,423

MAGLC (ug/m3): 23,406

Physical changes to or 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 Toxics 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 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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], 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 satisfy the Air Toxic Policy:"

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

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

c. when the 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.

6. The permittee shall collect and record the following information each month for the entire facility:

a. The name and identification of each HAP employed.

b. The amount of each HAP employed, in pounds.

c. The total individual HAP emissions from each individual HAP employed, in pounds or tons per month.

d. The total combined HAP emissions from all HAPs employed, in pounds or tons per month.

e. The updated rolling, 12-month summation of emissions for each individual HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

f. The updated rolling, 12-month summation of emissions for the total combined HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to ne kept on an emission unit - by- emission unit basis.

7. The permittee shall maintain daily records of any day when nonphotochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.

D. Reporting Requirements

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

a. All periods of time during which the following scrubber parameters were not maintained at or above the required levels:

i. The scrubber water flow rate.

ii. The scrubber water supply pressure.

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b. All exceedances of the updated rolling, 12- month summation of the organic solvent usage rate and the updated rolling, 12-month OC emissions limitations.

c. All exceedances of the HAP usage limitations set forth in term A.2.c.

d. Each day during which a photochemically reactive material was employed where the OC emission rate exceeded 8 pounds per hour and/or 40 pounds per day.

e. Any day non-photochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.

2. These quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the organic solvent content limit per batch set forth in term A.2.d. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period then a report is required stating so.

4. The permittee shall submit annual PM/PM10 and OC emissions reports.

5. These annual reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emission limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

2. Emission limitation:

0.01 lb PM/PM10/hr and 0.04 TPY

Applicable Compliance Method:
Compliance shall be determined utilizing the total dry material throughput (in lbs/hr) multiplied by the minimum HEPA control efficiency of 99.97%. The hourly number is then multiplied by 8760 hours per year and divided by 2000 lbs/ton.

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3. Emission limitation :
9.5 lbs OC/hr

Applicable Compliance Method:

Compliance shall be determined based on the emissions testing for emissions unit P044 and P045.

4. Emission limitation:

6.0 TPY OC, based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be determined by the record keeping in term C.4.

5. Emission limitation:

8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials.

Applicable Compliance Method:

Compliance shall be determined by the record keeping in term C.2.

6. Emission limitation:

The maximum annual organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

Applicable Compliance Method:

Compliance shall be determined by the record keeping in term C.3.

7. Emission limitation:

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs

Applicable Compliance Method:

Compliance shall be determined by the record keeping in term C.6.

8. Emission limitation:

The maximum organic compound solvent content per batch shall not exceed 220 pounds/batch.

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Applicable Compliance Method:

Compliance shall be determined by the record keeping in term C.4.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1 - C.4, C.6. C.7., D. and E.

2. The terms and conditions in this permit to install shall supersede Permit to Install 14-03855 issued on October 18, 2002 for this emissions unit

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P047 - granulation drying oven TG-84 with fabric filter and wet scrubber - modification	OAC rule 3745-31-05(A)(3)	0.01 lb/hr and 0.04 TPY PM/PM10* 9.5 lbs OC/hr* and 33 lbs OC/day** when employing nonphotochemically reactive materials. *The hourly and annual emission limitations for PM/PM10 and the hourly non-photochemically reactive OC limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits. ** this emissions unit is a batch operation and the daily emissions are based on the worst case batch employed in this emission unit. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), 3745-21-07(G)(2), and OAC rule 3745-31-05(D). 8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average,

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	except as specified by rule.
OAC rule 3745-17-11(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).
OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-31-05(D)	See terms A.2.c and B.4 6.0 TPY OC***, based on a rolling, 12-month summation. ***for purposes of determining the applicability of whether or not this permitting action would be considered a major stationary source subject to Emissions Offset Policy, all VOC emissions are considered to be OC.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by emissions limitations, the use of a HEPA filter with a control efficiency of at least 99.9 percent for particulate emissions, the use of a wet scrubber with a control efficiency of at least 90 percent when non-photochemically reactive material is employed, and compliance with the Ohio EPA Air Toxics Policy.

2.b The permittee shall control non-photochemically reactive material OC emissions from this emissions unit by use of a wet scrubber capable of maintaining an minimum overall OC control efficiency of 90% by weight. The requirement to use a wet scrubber does not apply when the permittee does not use any organic compounds as wetting agents or when employing photochemically reactive material as long as the permittee meets the mass emissions limitations listed in A.1 above.

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2.c The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation. The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limitation.

2.d The maximum organic compound solvent content per batch shall not exceed 220 pounds/batch.

B. Operational Restrictions

1. The scrubber water supply pressure shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.

2. The scrubber water flow rate shall be continuously maintained at a value not less than that established during the most recent emission test that demonstrated compliance while the emissions unit is in operation.

3. The operation of the control equipment outside of the restrictions established in the Special Terms and Conditions may or may not indicate a mass emission violation. If required by the Ohio EPA, compliance with the mass emission limitations shall be determined by performing concurrent mass emission tests and parameter readings, using US EPA-approved methods and procedures. The results of any required emission tests and parameter readings shall be used in determining whether or not the operation of the control equipment outside of the restrictions specified in the Special Terms and Conditions is indicative of a possible violation of the mass emission limitations.

4. The maximum annual organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

   The permittee has existing records to demonstrate compliance with this term upon issuance of this permit.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the scrubber water supply pressure and scrubber water flow rate while the emissions unit is in operation. The monitoring devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with deviations as deemed necessary by the permittee.

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The permittee shall collect and record the following information each day that the emissions unit is operating:

a. The scrubber water flow rate, in gallons per minute.

b. The scrubber water supply pressure, in psig.

c. A log of the operating time for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

d. The position of the by-pass valve, indicating whether the exhaust stream from the ovens is going to the wet scrubbers.

2. On any day that any photochemically reactive material [as identified in OAC rule 3745-21-01(C)(5)] is employed, the permittee shall collect and record the following information:

a. The company identification of each organic solvent material employed.

b. The total amount of organic solvent material employed, in pounds.

c. The total organic compound emissions from all organic solvents employed, in pounds

d. The total number of hours of operation.

e. The average hourly organic compound emission rate for all organic solvents employed, (c/d), in pounds per hour (average).

3. The permittee shall maintain monthly records of following information:

a. The organic solvent usage rate for each month, in pounds.

b. The rolling, 12-month summation of the organic solvent usage rate, in pounds.

4. The permittee shall collect and record the following information each month:

a. The number of batches made during the month.

b. The OC solvent content of each batch, in pounds per batch.

c. An identification of whether the OC content of the material employed is photochemically reactive material,

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d. The total amount of non-PRM solvent sprayed during the month, in pounds.

e. The total amount of PRM solvent sprayed during the month, in pounds.

f. The monthly OC emissions calculated as follows for non-PRM materials:
Monthly OC emissions (lbs/month)
= total solvent sprayed during the month (pounds) * (1- the control efficiency determined during the most recent performance test)

g. The monthly OC emissions calculated as follows for PRM materials:
Monthly OC emissions (lbs/month)
= total solvent sprayed during the month (pounds)

h. The total monthly OC emissions calculated for non-PRM materials and PRM materials (f+g), in lbs/month.

i. The rolling, 12-month OC emission rate in tons per year

These records shall be summarized at the end of each calendar year to determine the annual OC emissions.

5. The permit to install for this emissions unit 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 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (ug/m3): 1,884,254

Maximum Hourly Emission Rate (lbs/hr): 38.0 (Emissions units P044 - P047, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,423

MAGLC (ug/m3): 44,863

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Pollutant: Isopropanol

TLV (ug/m3): 983,067

Maximum Hourly Emission Rate (lbs/hr): 38.0 (Emissions units P044 - P047, combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,423

MAGLC (ug/m3): 23,406

Physical changes to or 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 Toxics 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 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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], 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 satisfy the Air Toxic Policy:"

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

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

c. when the 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.

6. The permittee shall collect and record the following information each month for the entire facility:

a. The name and identification of each HAP employed.

b. The amount of each HAP employed, in pounds.

c. The total individual HAP emissions from each individual HAP employed, in pounds or tons per month.

d. The total combined HAP emissions from all HAPs employed, in pounds or tons per month.

e. The updated rolling, 12-month summation of emissions for each individual HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

f. The updated rolling, 12-month summation of emissions for the total combined HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to ne kept on an emission unit - by- emission unit basis.

7. The permittee shall maintain daily records of any day when nonphotochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.

D. Reporting Requirements

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

a. All periods of time during which the following scrubber parameters were not maintained at or above the required levels:

i. The scrubber water flow rate.

ii. The scrubber water supply pressure.

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b. All exceedances of the updated rolling, 12- month summation of the organic solvent usage rate and the updated rolling, 12-month OC emissions limitations.

c. All exceedances of the HAP usage limitations set forth in term A.2.c.

d. Each day during which a photochemically reactive material was employed where the OC emission rate exceeded 8 pounds per hour and/or 40 pounds per day.

e. Any day non-photochemically reactive organic materials are employed in the emissions unit and the scrubber was not operated.

2. These quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the organic solvent content limit per batch set forth in term A.2.d. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period then a report is required stating so.

4. The permittee shall submit annual PM/PM10 and OC emissions reports.

5. These annual reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Emission limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

2. Emission limitation:

0.01 lb PM/PM10/hr and 0.04 TPY

Applicable Compliance Method:
Compliance shall be determined utilizing the total dry material throughput (in lbs/hr) multiplied by the minimum HEPA control efficiency of 99.97%. The hourly number is then multiplied by 8760 hours per year and divided by 2000 lbs/ton.

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3. Emission limitation :
9.5 lbs OC/hr

Applicable Compliance Method:

Compliance shall be determined based on the emissions testing for emissions unit P044 and P045.

4. Emission limitation:

6.0 TPY OC based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be determined by the record keeping in term C.4.

5. Emission limitation:

8 lbs OC /hour, 40 lbs OC/day when employing photochemically reactive materials.

Applicable Compliance Method:

Compliance shall be determined by the record keeping in term C.2.

6. Emission limitation:

The maximum annual organic solvent usage rate for this emissions unit shall not exceed 120,450 pounds per year, based upon a rolling, 12-month summation of the usage rates.

Applicable Compliance Method:

Compliance shall be determined by the record keeping in term C.3.

7. Emission limitation:

9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs

Applicable Compliance Method:

Compliance shall be determined by the record keeping in term C.6.

8. Emission limitation:

The maximum organic compound solvent content per batch shall not exceed 220 pounds/batch.

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Applicable Compliance Method:

Compliance shall be determined by the record keeping in term C.4.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1 - C.4, C.6. C.7., D. and E.

2. The terms and conditions in this permit to install shall supersede Permit to Install 14-03855 issued on October 18, 2002 for this emissions unit

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