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Facility Name: **Ashland Chemical Company**

Application Number: **03-0248**

Date: **July 22, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio 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

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approval constitutes a violation of Ohio Administrative Code (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 prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

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

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for period of up to one year from the date the source commenced operation. This 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.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Ashland Chemical Company** located in **Ashland** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P006 (Mod)	1,000 gallon adhesive/sealant mixer	Compliance with Ohio's Air Toxic Policy, and compliance with the terms and conditions of this permit	3745-21-07 (G)(2)	OC Emissions adhesive/sealant: 8 pounds OC/hour, 40 pounds OC/day
			3745-31-05	Cleanup: 82.1 pounds OC/month (See Additional Special Terms and Conditions)
				Total: 7.79 tons OC/year (See Additional Special Terms and Conditions)
				Particulate emissions (PE): adhesive/sealant: 1.75 pounds

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P006 (Mod) Cont'd				PE/hour 3.83 tons PE/year, 0 percent opacity as a six-minute average. * 3745-17-11 (B) * 3745-17-07 (A)
P007 (Mod)	750 gallon adhesive/ sealant mixer	Compliance with Ohio's Air Toxic Policy, and compliance with the terms and conditions of this permit	3745-21-07 (G)(2) 3745-31-05	OC Emissions adhesive/ sealant: 8 pounds OC/hour, 40 pounds OC/day Cleanup: 7.0 pounds OC/month (See Additional Special Terms and Conditions) Total: 7.34 tons OC/year (See Additional Special Terms and Conditions)

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P007 (Mod) Cont'd				Particulate emissions (PE): adhesive/sealant: 1.13 pounds PE/hour 4.2 tons PE/year, 0 percent opacity as a six-minute average.
			3745-17-11 (B)	*
			3745-17-07 (A)	*
P008 (Mod)	3,760 gallon mixer and two container filling operations	Compliance with Ohio's Air Toxic Policy, and compliance with the terms and conditions of this permit	3745-21-07 (G)(2)	OC Emissions adhesive/sealant: 8 pounds OC/hour, 40 pounds OC/day
			3745-31-05	Cleanup: 4.5 pounds OC/month (See Additional Special Terms and Conditions)
				Total: 7.32 tons OC/year (See Additional

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P008 (Mod) Cont'd				Special Terms and Conditions)
				Particulate emissions (PE): adhesive/sealant: 0.37 pound PE/hour 0.75 ton PE/year, 0 percent opacity as a six-minute average.
			3745-17-11 (B)	*
			3745-17-07 (A)	*
T009 (Mod)	20,000 gallon fixed-roof above ground storage tank. (Hexane)	Compliance with the terms and conditions of this permit.	3745-31-05	OC Emissions 514 pounds OC/month, 3.1 tons OC/year (See Additional Special Terms and Conditions)
			NSPS Subpart Kb, 40 CFR Part 60	(See terms and conditions)
			3745-21-07 (A)(1)	(No limitations established)

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P016 (Mod)	Natural gas-fired curing oven	Compliance with Ohio's Air Toxic Policy, and compliance with the terms and conditions of this permit	3745-21-07 (G)(1)	OC Emissions 3 pounds OC/hour, 15 pounds OC/day, 2.73 tons OC/year (See Additional Special Terms and Conditions)

* The emission limitations/opacity restrictions established by these rules are less stringent than those established by OAC rule 3745-31-05.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	28.28
PE	8.77

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
T009	20,000 gallon storage tank	Kb

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The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and **Ohio EPA, Northwest District Office**
347 North Dunbridge Road
Bowling Green, OH 43402

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

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MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NEW SOURCE PERFORMANCE STANDARD SUBPART Kb

The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

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Source Number(s)

Tank Size

T009

20,000 gallons

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Introduction

The company is a Title V facility. They are requesting to modify 3 mixers, a storage tank, and a natural gas fired curing oven. This modification request is to accommodate future production increases.

A. Applicable Emission Limitations and/or Control Requirements

1. Adhesives and sealants produced by emissions units P006, P007, and P008 are "photochemically reactive" as defined in Ohio administrative Code (OAC) Rule 3745-21-01 (C) (5). According to applicable rule OAC 3745-21-07 (G) (2), organic compound emissions (including fugitive), for emissions unit P006, P007, P008 shall not exceed 8 pounds OC/hour and 40 pounds OC/day.
2. OC cleanup emissions shall not exceed 82.1 pounds/month for emissions unit P006. OC cleanup emissions shall not exceed 7.0 pounds/month for emissions unit P007. OC cleanup emissions shall not exceed 4.5 pounds/month for emissions unit P008.
3. Emissions of organic compounds from the curing oven emissions unit P016 shall not exceed 3 pounds in any one hour, or 15 pounds in any one day, according to applicable rule OAC 3745-21-07 (G) (1).
4. Emissions of organic compounds from the storage tank emissions unit T009 shall not exceed 514 pounds OC/month, and 3.1 tons OC/yr.
5. Particulate emissions from emissions units P006 shall not exceed 1.75 pounds/hour and 3.83 tons/year. Particulate emissions from emissions unit P007 shall not exceed 1.13 pounds/hour and 4.2 tons/year and emissions of particulate matter from emissions unit P008 shall not exceed 0.37 pound/hour and 0.75 ton/year.

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6. Visible emissions of particulate matter from emissions units P006, P007, and P008 shall each not exceed 0 percent opacity as a six-minute average from any stack.

B. Operational Restrictions

1. Cleanup materials employed in emissions units P006, P007, and P008 shall not be photochemically reactive as defined by OAC Rule 3745-21-01 (C)(5).
2. This permit allows for the use of the adhesives/sealants specified by the permittee in PTI number 03-10248. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitations specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on both the adhesive/sealant material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 2 model and a comparison of the predicted 1 hour maximum ground level concentration to the MAGLC. The following table summarizes the results of the modeling for each pollutant:

<u>Pollutant</u>	<u>TLV</u> <u>(ug/m3)</u>	<u>Maximum Hourly</u> <u>Emission Rate</u> <u>(lbs/hr)</u>	<u>Predicted 1</u> <u>Hour Maximum</u> <u>Ground-Level</u> <u>Concentration</u> <u>at the</u> <u>Fenceline</u> <u>(ug/m3)</u>	<u>Maximum</u> <u>Acceptable</u> <u>Ground-Level</u> <u>Concentration</u> <u>(MAGLC)</u> <u>(ug/m3)</u>
Hexane	176,000	24.7	1,794	4,190

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA are required:

- a. any change in the composition of the adhesive or cleanup materials, or the use of new adhesives or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent

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version of the handbook entitled American Conference of Governmental Industrial Hygienists (ACGIH), than the lowest TLV value specified in the above table;

- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01; and,
- d. any change in the composition of the adhesives or cleanup materials, that would result in the emission of any of the exempted volatile organic compounds included in the definition of "VOC" [OAC rule 3745-21-01 (B) (6)].

C. Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit P006:

Process and Fugitive Emissions

- a. the total number of batches each emissions unit operates per day;
- b. the total number of hours the emissions unit was in operation;
- c. the number of batches per hour (a/c);
- d. the average organic compound emission rate, in pounds per hour; (c x 11.84 pounds/batch*); and,
- e. the average organic compound emission rate, in pounds per day; (a x 11.84 pounds/batch*).

* The OC emissions were determined to be 11.84 pounds/batch, this included process and fugitive

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emissions. The emission factors were supplied in application by company.

2. The permittee shall collect and record the following information each day for emissions unit P007:

Process and Fugitive Emissions

- a. the total number of batches the emissions unit operates per day;
- b. the total number of hours each emissions unit was in operation;
- c. the number of batches per hour (a/c);
- d. the average organic compound emission rate, in pounds per hour; (d x 6.76 pounds/batch*); and,
- e. the average organic compound emission rate, in pounds per day; (a x 6.67 pounds/batch*).

* The OC emissions were determined to be 6.67 pounds/batch, this included process and Fugitive emissions. The emission factors were supplied in application by company.

3. The permittee shall collect and record the following information each day for emissions unit P008:

Process and fugitive emissions

- a. the total number of batches the emissions unit operates per day;
- b. the total number of hours the emissions unit was in operation;
- c. the number of batches per hour (a/c);
- d. the average organic compound emission rate, in pounds per hour; (c x 9.4 pounds/batch*); and,
- e. the average organic compound emission rate, in pounds per day; (a x 9.4 pounds/batch*).

* The OC emissions were determined to be 9.4 pounds /batch, this included process and fugitive

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emissions. The emission factors were supplied in application by the company.

4. The permittee shall collect and record the following information each month for emissions unit P006.

Cleanup Emissions

- a. the name and identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the OC content of each cleanup material, in pounds per gallon;
 - d. the OC emission rate from each cleanup material, in pounds per month $(b) \times (c)$; and,
 - e. the OC emission rate from all cleanup materials employed in pounds per month $[\sum(d)]$.
5. The permittee shall collect and record the following information each month for emissions unit P007.

Cleanup Emissions

- a. the name and identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the OC content of each cleanup material, in pounds per gallon;
- d. the OC emission rate from each cleanup material, in pounds per month $(b) \times (c)$; and,
- e. the OC emission rate from all cleanup materials employed in pounds per month $[\sum(d)]$.

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6. The permittee shall collect and record the following information each month for emissions unit P008.

Cleanup Emissions

- a. the name and identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the OC content of each cleanup material, in pounds per gallon;
 - d. the OC emission rate from each cleanup material, in pounds per month $(b) \times (c)$; and,
 - e. the OC emission rate from all cleanup materials employed $[\sum(d)]$.
7. The permittee shall collect and record the following information on an annual basis for emissions unit P006.

Total Emissions

- a. total number of batches the emissions unit operates per year;
 - b. the annual organic compound emissions rate, in tons per year, not including cleanup $(a \times 11.84 \text{ pounds/batch})$;
 - c. the annual summation of Additional Special Term and Condition C.4.e., in tons/yr; and,
 - d. total annual OC emissions, in tons/yr. $(b + c)$.
8. The permittee shall collect and record the following information on an annual basis for emissions unit P007.

Total Emissions

- a. total number of batches the emissions unit operates per year;
- b. the annual organic compound emissions rate, in tons per year, not including cleanup $(a \times 6.67 \text{ pounds/batch})$;

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- c. the annual summation of Additional Special Term and Condition C.5.e., in tons/yr; and,
 - d. total annual OC emissions, in tons/yr. (b + c).
9. The permittee shall collect and record the following information on an annual basis for emissions unit P008.

Total Emissions

- a. total number of bathes the emissions unit operates per year;
 - b. the annual organic compound emission rate, in tons per year, not including cleanup (a x 9.4 pounds/batch);
 - c. the annual summation of Additional Special Term and Condition C.6.e., in tons/yr; and,
 - d. total annual OC emissions, in tons/yr (b + c).
10. The permittee shall collect and record the following information each day for emissions unit P016:
- a. the total number of hours emissions unit P016 was in operation;
 - b. the total amount of adhesive, used in pounds/day;
 - c. the total organic compound emission rate in pounds per day**; and,
 - d. the total organic compound emission rate in lbs per hour (c/a)**.

** OC emissions shall be calculated by using the formulas supplied by the company in the PTI application for this emissions unit.

11. The permittee shall collect and record the following information each month for emissions unit T009:
- a. the total monthly gallon throughput in gallons per month for emissions unit T009.
12. Each record of any monitoring data, testing data, and support information required pursuant to this permit

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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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. 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 emissions limitations, operational restrictions, and control device operating parameter limitations that have detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA Northwest District Office. 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.)
2. The compliance status of the emissions unit shall be reported pursuant to the annual certification required by OAC rule 3745-77-07(C) (5).
3. The actual annual emissions data for the emissions unit shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

E. Testing Requirements

1. Compliance with the emission limitation(s) found in the "Air Emissions Summary" of this permit shall be determined in accordance with the following method(s):
 - a. Emission limitations for P006:
8 pounds OC/hour, 40 pounds OC/day

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Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in Section C. of these terms and conditions.

b. Emission limitations for P007:

8 pounds OC/hour, 40 pounds OC/day

Applicable Compliance Method:

Compliance shall be based on the recordkeeping specified in Section C. of these terms and conditions.

c. Emission limitations for P008:

8 pounds OC/hour, 40 pounds OC/day

Applicable Compliance Method:

Compliance shall be based on the recordkeeping specified in Section C. of these terms and conditions.

d. Emission limitations for cleanup material usage for P006:

82.1 pounds OC/month

Applicable Compliance Method:

Compliance shall be based on the recordkeeping specified in Section C. of these terms and conditions.

e. Emission limitations for cleanup material usage for P007:

7.0 pounds OC/month

Applicable Compliance Method:

Compliance shall be based on the recordkeeping specified in Section C. of these terms and conditions.

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- f. Emission limitations for cleanup material usage for P008:

4.5 pounds OC/month

Applicable Compliance Method:

Compliance shall be based on the recordkeeping specified in Section C. of these terms and conditions.

- g. Total emission limitations for emissions unit P006:

8 pounds OC/hour, 40 pounds OC/day, 7.79 tons OC/year

Applicable Compliance Method:

Compliance shall be based on the recordkeeping specified in Section C. of these terms and conditions.

- h. Total emission limitations for emissions unit P007:

7.34 tons OC/year

Applicable Compliance Method:

Compliance shall be based on the recordkeeping specified in Section C. of these terms and conditions.

- i. Total emission limitations for emissions unit P008:

7.32 tons OC/year

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in Section C. of these terms and conditions.

- j. Emission limitations of OC for emissions unit P016 specified in the Applicable Emissions Limitations Section of these terms and conditions:

3 pounds OC/hour, 15 pounds OC/day, 2.73 tons OC/year

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Applicable Compliance Method:

Compliance shall be based on the recordkeeping specified in Section C. of these terms and conditions.

- k. Emission Limitations for PE from emissions units P006, P007, and P008 in Applicable Emissions Limitations Section of these terms and conditions:

(P006) 1.75 pounds PE/hour, 3.83 TPY; (P007) 1.13 pounds PE/hour, 4.2 TPY; (P008) 0.37 pound PE/hour, 0.75 TPY.

Applicable Compliance Method P006 and P007:

Compliance with the lbs/hr PE emissions limit shall be based on calculations using the following equation:

$$E = S \times B \times EF$$

Where:

E = pounds/hour particulate emissions

S = Max. solids

B = Average batches per hour

EF = Emission factor 0.5 percent for uncontrolled emissions rate for particulates: (0.5 percent used from application).

Compliance with the ton per year PE emissions limit shall be based on calculations by using the following equation:

$$E = P \times T$$

Where:

E = Tons/year particulate emissions

P = Pounds/batch particulate emissions

T = Total batches per year

If required, the permittee shall demonstrate compliance with the above emission limit pursuant to OAC 3745-17-03(B)(10).

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Applicable Compliance Method for P008:

Compliance with the pounds/hour emission limit shall be based on calculations by using the following equation:

$$E = S \times B \times EF(0.5 \text{ percent}) \times 1 - ce (1 - 0.9)$$

Where:

E = pounds/hour

S = maximum solids

B = Average batches per hour

EF = Emission factor for uncontrolled emission rate for particulates (0.5 percent) CE= Closed loop solids injection system, (capture and control emissions by 90 percent)

If required, the permittee shall demonstrate compliance with the above emission limit pursuant to OAC 3745-17-03-(B)(10).

Compliance with the tons/yr emission limit shall be based on calculations by using the following equation:

$$E = P \times T$$

Where:

E = Tons/year particulate emissions

P = Pounds/batch particulate emissions

T = Total batches per year

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC 3745-17-03(B)(10)

1. Emission Limitation for emission units P006, P007, and P008:

0 percent opacity, as a six minute average

Applicable Compliance Method:

40 CFR Part 60 Appendix A Method 9.

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- m. Emission limitations of OC for emissions unit T009 specified in the Applicable Limitations Section of these terms and conditions:

514 pounds OC/month, 3.1 tons OC/yr

Applicable compliance method:

Compliance shall be based upon the calculations from U.S. EPA's "Tanks3" program, and number 11 of the recordkeeping section.

G. Miscellaneous Requirements

- 1. None.