



09/02/2026

Jenny Crittell
Huntsman Advanced Materials Americas, LLC
10003 Woodloch Forest Dr
The Woodlands, TX 77380

Facility ID: 1677010029
Permit Number: P0140308
County: Summit

RE: DRAFT AIR POLLUTION TITLE V PERMIT

Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and Public Notices website, [*Weekly Review and Public Notices*](#). A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search website here: [*eDocument Search*](#). Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and

Akron Regional Air Quality Management
District
1867 West Market St.
Akron, OH 44313

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published on the Ohio EPA Weekly Review and Public Notices website, [*Weekly Review and Public Notices | Ohio Environmental Protection Agency*](#). You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 - *Via E-Mail Notification*
 ARAQMD; Pennsylvania; West Virginia

Public Notice

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: [Weekly Review and Public Notices | Ohio Environmental Protection Agency](#) or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Phone: 614-644-3037 Email: HClerk@epa.ohio.gov

Draft Title V Permit Renewal

Huntsman Advanced Materials Americas, LLC
240 West Emerling Avenue
Akron, OH 44301-1600

ID#:	P0140308
Date of Action:	09/02/2026
Permit Desc:	Title V renewal for industrial organic chemical facility. The permitted units include two natural gas-fired boilers, synthetic rubber latex manufacturing, and reactive liquid polymers process.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <https://ohioepa.commentinput.com> - Search by entering the permit # P0140308 in the "Search Projects" search box.

Statement of Basis* For Air Pollution Title V Permit

*As defined in OAC rule 3745-77-01(MM): “Statement of basis” or “SOB” means a statement that sets forth the legal and factual basis for the draft [Title V] permit conditions (including references to the applicable statutory or regulatory provisions).”

Completing this form is intended to satisfy those requirements.

Facility ID:	1677010029
Facility Name:	Huntsman Advanced Materials Americas, LLC
Facility Description:	Industrial Organic Chemicals
Facility Address:	240 West Emerling Avenue Akron, OH 44301-1600
Permit #:	P0140308

This facility is subject to Title V because it is major for:

☐ Lead ☒ Sulfur Dioxide ☐ Carbon Monoxide ☒ Volatile Organic Compounds ☒ Nitrogen Oxides

☒ Particulate Matter $\leq$ 10 microns ☒ Single Hazardous Air Pollutant ☒ Combined Hazardous Air Pollutants ☒ GHG

And/or subject to:

☒ Maximum Available Control Technology Standard(s) ☐ GACT standard(s) that requires a Title V permit ☐ Title IV ☐ Opt-In source

A. Permit Background

1. Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(V)?

Yes	No	Comments: Yes
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2. Discuss any **common control determinations** (this includes revisions to previous determinations), include justification, factors, and facts which led to the final decision.

Discussion: No

3. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from **a renewal** per OAC rule 3745-77-08(E). This includes identifying conditions from previous permits that are not included in the new permit.

PTI No.: NA

Affected EUs: NA

Discussion of changes from the previous Title V: NA

4. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a **minor modification** per OAC rules 3745-77-08(C)(1) or (2)

PTI No.: NA

Affected EUs: NA

Minor Modification Description: NA

5. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a **significant permit modification** per OAC rule 3745-77-08(C)(3)

PTI No.: NA

Affected EUs: NA

Significant Modification Description: NA

6. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a **reopening** per OAC rule 3745-77-08(D)

PTI No.: NA

Affected EUs: NA

Reopening for Cause for Description: NA

7. Please identify the affected emissions unit(s) and pollutant(s) for which a **Compliance Assurance Monitoring (CAM)** Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.

Affected EUs: NA

8. Please identify any federal **Consent Decree (CD)** that resulted in the addition of Title V T&Cs – include the CD Number, the CD Public Notice date (if known) and Ohio EPA Permit Number (if applicable, along with final permit issuance date) that incorporates the CD requirements.

CD No. NA

Public
Notice
Date:

PTI No. NA

PTI Issuance Date:

9. Please identify any **complex or unusual rule applicability determination** that is not readily apparent in the permit T&Cs and warrants additional explanation in the Statement of Basis. If the discussion is included in a PTI Permit Strategy Write Up cite the Permit Number and copy/paste or summarize the determination here.

PTI No. NA

Discussion: NA

10. Please identify any **streamlining determinations** within the permit. Include an identification of the subsumed limit(s) and an explanation of how the resulting limit is equivalent to or more stringent than those subsumed. If the discussion exists in a PTI Permit Strategy Write Up, cite the Permit Number and summarize the determination here. This would also be noted for specific emissions units identified in C.

PTI No. NA

Discussion: NA

11. Please identify any current **enforcement actions** to address violations at the facility resulting in a compliance plan and schedule.

Director's Final Findings and Orders; AGO Consent Decree; or U.S. EPA Consent Decree Date: NA

List the Order/Injunctive Relief number from the associated enforcement document and provide a description: NA

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2	N	Y	This is a statement that says the facility is subject to 40 CFR Part 68.
B.3	77-07(A)(13)	N	List of insignificant emissions units that are subject to an emission limitation in a Permit to Install and/or state or federal regulation.
B.4	N	Y	Synthetic Minor to restrict PTE HAP emissions to avoid Subpart U
B.5	N	Y	Emissions units P007 and P020 are subject to 40 CFR Part 63, Subpart VVVVV
B.6	N	Y	Emissions units B010 and B015 are subject to 40 CFR Part 63, Subpart ZZZZ.
B.7	N	Y	Emissions unit P026 is subject to 40 CFR Part 60, Subpart JJJJ

C. Emissions Unit Terms and Conditions

Key: EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements ENF = did noncompliance issues drive the monitoring requirements?	R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) Misc = miscellaneous requirements
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Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
Section C.1:											
B001 and B014	0.020 pound of particulates per	17-10(B)(1)	N	N	N	N	N	N	N	N	M, R, Rp and ET are not required. AP-42 emission factors are well developed for these types of emissions units.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	million Btu actual heat input										
B001 and B014	none	18-06(A)	Y	N	N	N	N	N	N	N	ND – Statement that emissions unit is exempt from paragraphs (D), (F) and (G) of OAC rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 during any calendar day in which natural gas is the only fuel burned.
B001	Synthetic Minor to avoid NOX RACT requirements in OAC rule 3745-110-03	31-05(D)	N	Y	N	Y	N	N	N	N	The maximum natural gas fuel usage for this emissions unit shall not exceed 198 MMcf per year.
B001	none	110-03(K)(17)	Y	N	N	N	N	N	N	N	Other – OAC rule 3745-110-03(K)(17) ND – Statement that emissions unit is exempt from paragraphs (A) to (G) of OAC rule 3745-110-03, the source is restricted to less than 10 tons per year or less of NOx through restriction of fuel usage.
B014	Install burners that are designed to meet 0.042 pound of NO _x per MM Btu and 0.036 pound of CO per MM Btu when not serving as an air pollution control device. Install burners that are designed to meet 0.001 pound of particulate emissions (PE) per MM Btu and	31-05(A)(3)	N	N	N	N	N	N	N	N	M, R, Rp and ET are not required. Emission limitations based on Johnston Boiler Company's design specification sheet for the burner emissions dated March 10, 2014.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	0.004 pound of volatile organic compounds (VOC) per MM Btu.										
B014	When this emissions unit is not being employed as an air pollution control device for emissions unit P007, the emissions of NO _x shall not exceed 0.10 pound per MM Btu when burning natural gas only.	N	Y	N	N	N	N	Y	N	N	Other – OAC rule 3745-110-03(B) M, R, and Rp – There are no monitoring, record keeping and report requirements in OAC rule 3745-110-03(B). There is only testing requirements.
B014	When this emissions unit is being employed as an air pollution control device for emissions unit P007, the requirements of paragraphs (A) to (G) of OAC rule 3745-110-03 shall not apply.	N	Y	N	N	N	N	N	N	N	Other – OAC rule 3745-110-03(K)(14) ND – Statement that when the emissions unit is used as an air pollution control device for emissions unit P007, the requirements of paragraphs (A) to (G) of OAC rule 3745-110-03 do not apply.
B014	There are no applicable emission limitations established pursuant	N	N	N	N	Y	Y	N	N	N	Other – 40 CFR Part 60, Subpart Dc ET – There are no applicable emission limitations since this emissions unit only burns natural gas.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	to this rule for emissions units which combust only natural gas.										
B001 and B014	20% opacity as a six-minute average	17-07(A)	N	N	Y	Y	Y	N	N	N	ET – Permittee demonstrates compliance through the monitoring and record keeping requirements. Emission testing is not required.
P007	85% overall control efficiency for VOC, by weight	21-07(M)(2)	N	N	Y	Y	Y	Y	N	N	ET – Emissions testing required approximately three months after issuance of the permit (following the effective date for the Title V permit).
P020	9.6 tons of VOC per year	31-05	N	N	Y	Y	Y	N	N	N	ET – Compliance with this emission limitation is determined through record keeping.
P020	85% overall control efficiency for VOC, by weight	31-05	N	N	Y	Y	Y	Y	N	N	ET - Emissions testing required approximately three months after issuance of the permit (following the effective date for the Title V permit).



**Environmental
Protection
Agency**

DRAFT

**Division of Air Pollution Control
Title V Permit**

for

Huntsman Advanced Materials Americas, LLC

Facility ID:	1677010029
Permit Number:	P0140308
Permit Type:	Renewal
Issued:	09/02/2026
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

**Division of Air Pollution Control
Title V Permit**

for

Huntsman Advanced Materials Americas, LLC

Table of Contents

Authorization.....	14
List of Commonly Used Abbreviations	15
A. Standard Terms and Conditions	16
B. Facility Wide Terms and Conditions	30
C. Emissions Unit Terms and Conditions.....	39
1. B001, Gas Boiler #1	40
2. B014, 90.67 MMBtu/hr NG boiler	45
3. P007, Latex.....	51
4. P020, RLP	57

Authorization

Facility ID:	1677010029
Facility Description:	Industrial Organic Chemicals
Application Number(s):	A0079456
Permit Number:	P0140308
Permit Description:	Title V renewal for industrial organic chemical facility. The permitted units include two natural gas-fired boilers, synthetic rubber latex manufacturing, and reactive liquid polymers process.
Permit Type:	Renewal
Issue Date:	
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0129543

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

Huntsman Advanced Materials Americas, LLC
240 West Emerling Avenue
Akron, OH 44301-1600

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

John Logue
Director

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m ³ = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH ₄ = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO ₂ = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m ³ = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH ₃ = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO ₂ = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO _x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO ₂ = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H ₂ S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H ₂ SO ₄ = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible particulate emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m ³ = micrograms per cubic meter

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under state law only:
 - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting for State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30., Submitting Documents Required by this Permit

[Authority for term: ORC 3704.036(A)]

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

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

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

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

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



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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Akron Regional Air Quality Management District. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation



occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

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

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

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

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

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

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

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



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

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

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

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

[(Authority for term: OAC rule 3745-77-07(A)(3)(c)(v)]

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Akron Regional Air Quality Management District unless otherwise specified.

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

3. Reporting of Any Exceedance of a Federally Enforceable Emission Limitation or Control Requirement Resulting from Scheduled Maintenance

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

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

4. Risk Management Plans

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

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



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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:



- (1) The permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01 based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
- (2) The permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01 based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable; or
- (3) A combination of (1) and (2) above.

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the state, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under state law only.

[Authority for term: OAC rule 3745-77-07(B)]

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Akron Regional Air Quality Management District concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall



be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Akron Regional Air Quality Management District) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d)(2)a. above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d)(2)a. above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

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

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

16. Emergencies

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

[Authority for term: OAC rule 3745-77-07(G)]

17. Off-Permit Changes

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

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as “insignificant activities and emissions levels” as defined in OAC rule 3745-77-01. Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

(I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

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

20. Permit-to-Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

[Authority for term: OAC rule 3745-77-01]

23. Title VI Provisions

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

- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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

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

27. Scheduled Maintenance/Malfunction Reporting for State-Only Requirements

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 Akron Regional Air Quality Management District in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Akron Regional Air Quality Management District must be notified in writing of any transfer of this permit.

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

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

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

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

- a) Where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) Where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) Where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Akron Regional Air Quality Management District, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a) None.
2. This facility is subject to 40 CFR Part 68 (112(r) of the Clean Air Act).
3. The insignificant emissions units listed below are subject to requirements contained in a permit-to-install, subject to a requirement in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, subject to a federal rule requirement, or otherwise subject to an *Applicable Requirement*, as defined in OAC Rule 3745-77-01:

EU ID	Operations, Property and/or Equipment Description	Permit #
B010	115 Kilowatt Detroit Model 53L-67 Electric Generator	PBR05454
B015	209 Horsepower Diesel Fire Pump (AKFAC PU-01Y01)	PBR17221
P026	60 Horsepower Natural Gas Fired Emergency Electric Generator	PBR11487

[Authority for term: OAC rule 3745-77-07(A)(13)]

4. Facility-Wide Synthetic Minor to limit the PTE of any single HAP and combined HAPs to avoid Subpart U — National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins.
 - a) The facility-wide individual HAP and the facility-wide total combined HAP emissions shall not exceed 9.9 and 24.9 tons per year, respectively, based upon a rolling, 12-month summations of the monthly HAP emission rates calculated quarterly.

[Authority for terms: OAC rule 3745-77-07(A)(1)]
 - b) Operational Restrictions
 - (1) Process emissions from EU P007 shall be vented to EU B001 or B014 at all times the P007 emission unit is in operation.
 - (2) Process emissions from EU P020 shall be vented to the thermal oxidizer at all times the P020 emission unit is in operation.
 - (3) The permittee shall implement an LDAR program equivalent to 40 CFR Part 63 Subpart H (version as promulgated in 85 FR 735854 on 11/19/2020) for all components contacting streams containing 5 wt % or greater HAP.

[Authority for term: OAC rule 3745-77-07(A)(1) and P0137816]
 - c) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record monthly process throughput and production information for emissions units B001, B014, P007, and P020 and use this data to calculate unit-specific individual HAP and total combined HAP emissions, in tons per month, each quarter.



- (2) The permittee shall calculate the rolling, 12-month summation of facility-wide individual HAP and facility-wide total combined HAP emissions, in tons, for comparison to the limits in B.4 each quarter.

[Authority for term: OAC rule 3745-77-07(A)(3)]

d) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All exceedances of the rolling, 12-month summations of facility-wide individual HAP and facility-wide total combined HAP emissions.

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

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate Ohio EPA DO/LAA).

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Testing Requirements

- (1) Compliance with the emission limitations in section B.4 shall be determined in accordance with the following method:

- a. Emission Limitation:

The facility-wide individual HAP and the facility-wide total combined HAP emissions shall not exceed 9.9 and 24.9 tons per year, respectively, based upon rolling, 12-month summations of the monthly HAP emission rates calculated quarterly.

Applicable Compliance Method:

Compliance with the facility-wide individual HAP and the facility-wide total combined HAP emissions limitations shall be based upon the recordkeeping requirements specified in B.4 and the control efficiencies for B001, B014, and the thermal oxidizer demonstrated during the most recent performance test.

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

5. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart VVVVV, NESHAP for Chemical Manufacturing, Area Sources. The following emissions units are subject to 40 CFR Part 63, Subpart VVVVV: P007 and P020. The complete GACT requirements, including the General Provisions, may be accessed via the internet from the e-CFR website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA DO/LAA. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, US EPA has the authority to enforce this standard. Please be advised that all requirements associated with this rule are in effect and shall be enforced by US EPA.

- a) In accordance with 40 CFR 63.11494(a) and (b), the emissions units listed above are part of a chemical manufacturing process with a specified Table 1 HAP and located at an area source of HAP emissions. The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subpart VVVVV, including the following sections:

§63.11494(d), (f), and (i)	Definition of affected sources and compliance dates.
§63.11494(e)	Area source requirement to obtain a Title V permit.
§63.11495(a)	Management practices to reduce hazardous air pollutant (HAP) emissions during everyday facility operations.
§63.11495(a)(1)	Each process vessel must be equipped with a cover or lid that must remain closed at all times when it contains organic or metal Hazardous Air Pollutants (HAPs).
§63.11495(a)(2)	Control hazardous air pollutant (HAP) emissions when transferring liquid chemicals.
§63.11495(a)(3)	Inspections on process vessels and equipment to ensure they are sound and free of hazardous air pollutant (HAP) leaks.
§63.11495(a)(4)	Facilities must repair any detected leak within 15 calendar days of detection, or document the reason for any delay.
§63.11495(a)(5)	Recordkeeping requirements for leak inspections and equipment repairs.
§63.11495(a)(6)	Monitoring and recordkeeping requirements for leak inspections and equipment repairs effective April 1, 2029.
§63.11495(b)	Regulation requirements for small heat exchange systems.
§63.11495(d)	General duty to operate and maintain the affected equipment (including pollution control and monitoring devices) safely and in a manner that minimizes air pollution emissions.
§63.11495(e)	Bypass provisions effective April 1, 2029.
§63.11496(a); Table 2	Organic HAP emission limits and compliance requirements specifically for "batch process vents".
§63.11496(g)	Performance testing and compliance procedures for controlling organic and halogenated hazardous air pollutants (HAP) from continuous and batch process vents in the Chemical Manufacturing Area Source.
§63.11496(i)	Startup, Shutdown, and Malfunction (SSM) provisions do not apply, the facility must comply with emissions standards at all times.
§63.11498(a); Table 6	The emission limits and compliance requirements for handling wastewater streams that contain HAP.



§63.11501(a); Table 9	Applicability of General Provisions.
§63.11501(b)	Notification of compliance status report requirements.
§63.11501(c)	Recordkeeping requirements.
§63.11501(d)	Requirements for Semiannual Compliance Reports.
§63.11502	Definitions
§63.11503	Implementation and enforcement

6. The following emissions units contained in this permit are subject to NESHAP for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ: B010. The complete NESHAP requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA DO/LAA.
- a) The permittee shall comply with the applicable emission limitations and other requirements under 40 CFR Part 63, Subpart ZZZZ, including the following sections and tables:

§63.6590	Affected source definition and stationary RICE subject to limited requirements (i.e., 40 CFR 60 Subpart JJJJ).
§63.6595(a)(1)	Affected source compliance dates and notifications.
§63.6603 Table 2d, item 4	Maintenance requirements, emission limits, and operating standards for existing generators and stationary engines at an area source of HAP emissions.
§63.6605(a)-(b)	General compliance requirements for minimizing emissions.
§63.6625(e)	Operation and maintenance requirements.
§63.6625(f)	Non-resettable hour meter installation requirements.
§63.6625(h)	Requirement to minimize the engine's time spent at idle during startup and restrict the total startup time to the period needed for appropriate and safe loading of the engine—not to exceed 30 minutes. After this 30-minute window, the standard (non-startup) emission limitations apply.
§63.6625(i)	Outlines an option to use an oil analysis program instead of following this rigid time/hour-based oil change schedule.
§63.6640(a) Table 6, item 9.a.i and ii	Continuous compliance with work management practices for minimizing emissions.
§63.6640(e)	Compliance requirement for each instance in which you fail to meet an emission or operating limitation as well as general requirements.



§63.6640(d)	For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations that occur during the first 200 hours of operation from engine startup (engine burn-in period) are not violations.
§63.6640(f)(1), (f)(2), (f)(2)(i), (f)(4), (f)(4)(i)	Requirements to be considered an emergency stationary ICE under this subpart.
§63.6645(a)	Notifications for General Provisions
§63.6650(b)	Compliance report schedule.
§63.6650(c)	Compliance report contents.
§63.6650(f)	Reporting requirements for deviations from emissions or operating limits.
§63.6650(i)	Requirement to submit reports through CEDRI beginning February 26, 2025.
§63.6655(a) and (d) Table 6	Recordkeeping requirements to demonstrate continuous compliance with each emission or operating limitation that applies.
§63.6655(e)	Recordkeeping requirements for maintaining stationary engines
§63.6655(f)	Recordkeeping requirements of hours of operation.
§63.6660(a)-(c)	Records format and retention requirements
§63.6665 Table 8	Applicability of General Provisions.
§63.6670	Who implements and enforces 40 CFR Part 63, Subpart ZZZZ.
§63.6675	Definitions that apply to 40 CFR Part 63, Subpart ZZZZ.

7. The following emissions unit contained in this permit is subject to New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ: P026. The complete requirements, including general provisions may be accessed via the internet from the electronic code of federal regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA DO/LAA.

- a) The permittee shall comply with the applicable emission standards and compliance requirements under 40 CFR Part 60, Subpart JJJJ, including the following sections and tables:

§60.4230	Affected source definition
§60.4233(d) Table 1	Compliance with NO _x , CO and VOC Emission Standards



§60.4234	Owners and Operators of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in §60.4233 over the entire life of the engine
§60.4237(c)	You must install a non-resettable hour meter upon startup of your emergency engine.
§60.4243(b)(1)	You must demonstrate compliance by purchasing an engine certified according to the procedures specified in 40 CFR Part 60, Subpart JJJJ, for the same model year and demonstrating compliance according to one of the methods specified in paragraph (a) of this section.
§60.4243(a)(1)	Requirement to operate according to manufacturer's instructions and good air pollution control practices, recordkeeping of conducted maintenance.
§60.4243(b)(2)(i)	Compliance requirements for owners and operators of non-certified stationary spark-ignition internal combustion engines.
§60.4243(d)	Operational and maintenance requirements.
§60.4243(e)	Use of alternative fuel during emergency operations.
§60.4243(f)	Compliance and performance testing requirements.
§60.4243(g)	It is expected that air-to-fuel ratio controllers will be used with the operation of three-way catalysts/non-selective catalytic reduction. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.
§60.4244	Test methods and other procedures that must be used by the owner or operator of a stationary SI internal combustion engine.
§60.4245(a)	Recordkeeping requirements.
§60.4245(b)	Recordkeeping of hours of operation.
§60.4245(d)	Reporting requirements for performance testing.
§60.4245(f)	Requirements for reporting performance test results through EPA's ERT website beginning February 26, 2025.
§60.4245(g)	Requirement to submit reports through CEDRI beginning February 26, 2025.
§60.4246(a)	Applicability of General Provisions.
§60.4248	Definitions that apply to 40 CFR Part 60, Subpart JJJJ.

8. The following emissions unit contained in this permit is subject to New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII: B015. The complete requirements, including general provisions may be accessed via the internet from the electronic code of federal regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA DO/LAA.
- a) The permittee shall comply with the applicable emission standards and compliance requirements under 40 CFR Part 60, Subpart IIII, including the following sections and tables:

§60.4200(a)(2)(ii)	Specifies applicability for fire pump engines certified to NFPA requirements.
§60.4205(c) Table 4	Compliance with NO _x , CO and VOC Emission Standards: NO _x : 4 g/kw-hr; NMHC: 4 g/kw-hr; CO: 3.5 g/kw-hr; and PM: 0.2 g/kw-hr
§60.4206	Owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in §60.4204 and 60.4205 over the entire life of the engine.
§60.4207(b)	Must use non-road diesel fuel that meets requirements of 40 CFR 1090.305.
§60.4211(a)	Comply with the emission standards specified in this subpart and do all of the following, except as permitted under §60.4211(g): (1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; (2) Change only those emission-related settings that are permitted by the manufacturer; and (3) Meet the requirements of 40 CFR part 1068, as they apply to you.
§60.4211(c)	Comply by purchasing an engine certified to the emission standards in §60.4205(c) for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in 60.4211(g).
§60.4211(f)	Requirements to be considered an emergency stationary ICE under this subpart.
§60.4214(d)	Reporting
§60.4214(g)	Reporting
§60.4214(h)	Reporting
§60.4214(i)	Reporting
§60.4214(j)	Recordkeeping

\$60.4218 Table 8	Applicability of General Provisions.
\$60.4219	Definitions that apply to 40 CFR Part 60, Subpart IIII.

C. Emissions Unit Terms and Conditions

1. B001, Gas Boiler #1

Operations, Property and/or Equipment Description:

93 MM Btu/hr Henry Vogt Machine Company natural gas fired boiler #1 - (Backup)

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

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (P0139259, effective as of May 26, 2026)	See b)(2)a. below.
b.	OAC rule 3745-31-05(D) Synthetic Minor to avoid NO _x RACT requirements in OAC rule 3745-110-03.	NO _x emissions shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions. See c)(2) below.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-10(B)(1)	The maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.
e.	OAC rule 3745-18-06(A)	This EU is exempt from paragraphs (D), (F) and (G) of OAC rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code during any calendar day in which natural gas is the only fuel burned.
f.	OAC rule 3745-110-03(K)(17)	The requirements of paragraphs (A) to (G) of OAC rule 3745-110-03 shall not apply to any affected source that is restricted to



		less than 10 tons per year or less of NOx emissions.
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(2) Additional Terms and Conditions

- a. BAT is not required for this emissions unit because it was installed before January 1, 1974, and have not been modified on or after January 1, 1974.

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

c) Operational Restrictions

- (1) The permittee shall only burn natural gas in this emissions unit as fuel. For the purposes of this requirements, VOC emissions from emissions unit P007 burned in this emissions unit shall not be considered a fuel.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-06(A)]

- (2) The maximum natural gas fuel usage for this emissions unit shall not exceed 198 MMcf per year, based upon a rolling, 12-month summation of the monthly natural gas fuel usage.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:

- a. The total amount of natural gas combusted, in MMcf per month.
- b. The rolling, 12-month summation of natural gas usage, in MMcf (the total amount of MMcf for the current month plus the total amount of MMcf for the previous eleven calendar months).
- c. The total monthly NOx emissions, in tons, calculated based on the fuel usage information collected in d)(1)a. and the methodology specified in f)(1)a. below.
- d. The rolling, 12-month summation of NOx emissions, in tons, (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

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

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

- a. The color of the emissions.
- b. Whether the emissions are representative of normal operations.



- c. If the emissions are not representative of normal operations, the cause of the abnormal emissions.
- d. The total duration of any visible emission incident.
- e. Any corrective actions taken to minimize or eliminate the visible emissions.

If visible PE are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(2)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to minimize or eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

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

[Authority of Term: OAC rule 3745-15-03(A)]

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

[Authority for term: OAC rule 3745-77-07(A)(3)]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

- a. The rolling, 12-month natural gas fuel usage restriction.
- b. All exceedances of the rolling, 12-month emission limitation for NOx.

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

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate Ohio EPA DO/LAA).

[Authority for term: OAC rule 3745-77-07(A)(3)]

- (4) The permittee shall submit semiannual written reports that identify:
 - a. All days during which any visible particulate emissions were observed from the stack serving this EU.
 - b. Any corrective actions taken to minimize or eliminate the visible particulate emissions.



These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

[Authority for term: OAC rule 3745-77-07(A)(3)]

f) Testing Requirements

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

a. Emissions Limitation

NO_x emissions shall not exceed 9.9 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance with the rolling, 12-month NO_x emission limitation identified above shall be demonstrated by the following calculation as long as compliance with the rolling, 12-month natural gas fuel usage restriction is maintained:

$$ENox = (EF \times A) / 2,000 \text{ lbs/ton}$$

where:

ENox = tons of NO_x emissions per month;

EF = 100 lbs of NO_x/MMcf - Natural gas emission factor from U.S. EPA AP-42, Table 1.4-1 (07/1998);

A = total monthly gas usage, in MMcf.

And

n

$\sum_{i=1}^n (ENox)$ is 9.9 TPY NO_x, as a rolling, 12-month summation

where:

n = months in the rolling, 12-month summation.

If required, compliance with the NO_x emission limitation shall be determined by performance testing conducted in accordance with Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A.

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

b. Emissions Limitation

The maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input. *



Applicable Compliance Method

If required, compliance with the allowable PE limitation above shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(9).

*Emission factor from U.S. EPA AP-42, Table 1.4-2 (07/1998).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(9)]

c. Emissions Limitation

Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance with the opacity limitation shall be demonstrated through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

g) **Miscellaneous Requirements**

(1) None.

2. B014, 90.67 MMBtu/hr NG boiler

Operations, Property and/or Equipment Description:

90.67 MM Btu/hour Johnston Boiler Company Natural Gas Fired Boiler

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

(1) b)(1)h. and g)(1).

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (P0116590 effective as of May 14, 2014)	Install burners that are designed to meet 0.042 pound of nitrogen oxides (NO _x) per million (MM) Btu and 0.036 pound of carbon monoxide (CO) per MM Btu when not serving as an air pollution control device.
b.	OAC rule 3745-31-05(A)(3) ORC 3704.03(T)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, SO ₂ and VOC emissions from this air contaminant source since the uncontrolled potential to emit for PE, SO ₂ and VOC is less than 10 tons per year.
c.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-10(B)(1)	The maximum allowable amount of PE shall be 0.020 pound per MM Btu of actual heat input.



e.	OAC rule 3745-18-06(A)	Fuel burning equipment is exempt from paragraphs (D), (F) and (G) of OAC rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code during any calendar day in which natural gas is the only fuel burned.
f.	OAC rule 3745-110-03(B)	When this emissions unit is not being employed as an air pollution control device for emissions unit P007, the emissions of NO _x shall not exceed 0.08 pound per MM Btu when burning natural gas only.
g.	OAC rule 3745-110-03(K)(14)	When this emissions unit is being employed as an air pollution control device for emissions unit P007, the requirements of paragraphs (A) to (G) of OAC rule 3745-110-03 shall not apply.
h.	OAC rule 3745-114-01	See g)(1) below.
i.	40 CFR Part 60, Subpart Dc	See b)(2)a., d)(3), d)(4), d)(5) and e)(3) below.
j.	40 CFR Part 60, Subpart A (40 CFR 60.1-60.19)	General Provisions.
k.	40 CFR Part 63, Subpart A Table 9	General Provisions.

(2) Additional Terms and Conditions

- a. There are no applicable emission limitations established pursuant to this rule for emissions units which combust only natural gas.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this EU. For the purposes of this requirement, VOC emissions from emissions unit P007 burned in this emissions unit shall not be considered a fuel.

[Authority of term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this EU.

[Authority of term: OAC rule 3745-77-07(A)(3) and OAC rule 3745-31-05]



- (2) The permittee shall perform daily checks, when the EU is in operation and when the weather conditions allow, for any visible PE from the stack(s) and for any visible PE of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this EU. The presence or absence of any visible PE shall be noted in an operations log. If visible PE are observed, the permittee shall also note the following in the operations log:
- a. The location and color of the emissions;
 - b. Whether the emissions are representative of normal operations;
 - c. If the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. The total duration of any visible PE incident; and
 - e. Any corrective actions taken to minimize or eliminate the visible PE.

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

[Authority of term: OAC rule 3745-77-07(A)(3)]

- (3) Except as provided under d)(4) and d)(5) below, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

[Authority of term: §63.48c(g)(1) of 40 CFR Part 60 Subpart Dc and OAC rule 3745-77-07(A)(3)]

- (4) As an alternative to meeting the requirements of d)(3) above, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

[Authority of term: §63.48c(g)(2) of 40 CFR Part 60 Subpart Dc and OAC rule 3745-77-07(A)(3)]

- (5) As an alternative to meeting the requirements of d)(3) above, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to 40 CFR Part 60 Subpart Dc) at that property are natural gas, wood, distillate oil meeting the most current requirements in §60.42C to use fuel certification to demonstrate compliance with the SO₂ standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total



amount of each steam generating unit fuel delivered to that property during each calendar month.

[Authority of term: §63.48c(g)(3) of 40 CFR Part 60 Subpart Dc and OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

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

[Authority of term: OAC rule 3745-77-07(A)(3)]

- (2) The permittee shall submit semiannual written reports that identify:
 - a. All days during which any visible particulate emissions were observed from the stack(s) serving this EU; and
 - b. Any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the appropriate Ohio EPA DO/LAA by January 31st and July 31st of each year and shall cover the previous 6-month period.

[Authority for term: 3745-77-07(A)(3)]

- (3) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of 40 CFR Part 60. This notification shall include:
 - a. The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
 - b. If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c or §60.43c.
 - c. The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
 - d. Notification if an emerging technology will be used for controlling SO₂ emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.

[Authority of term: §63.48c(a) of 40 CFR Part 60 Subpart Dc and OAC rule 3745-77-07(A)(3)].



f) Testing Requirements

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

a. Emissions Limitation

Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the stack visible PE limitation shall be demonstrated through the results of visible emissions observations performed in accordance with U.S. EPA Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

b. Emissions Limitation

Install burners that are designed to meet 0.042 pound of NO_x per MM Btu and 0.036 pound of CO per MM Btu when not serving as an air pollution control device.

Applicable Compliance Method

Compliance with the emission limitations above shall be based on Johnston Boiler Company's design specification sheet for the burner emissions dated March 10, 2014.

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

c. Emissions Limitation

The maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method

Compliance with the allowable PE limitation above shall be demonstrated by dividing the PE factor 7.6 pounds of PE per million scf of natural gas fired* by 1020 Btu per scf.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with OAC rule 3745-17-03(B)(9).

*AP-42 emission factor from Table 1.4-2 dated 7/98.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(9)]

d. Emissions Limitation

When this emissions unit is not being employed as an air pollution control device for emissions unit P007, the emissions of NO_x shall not exceed 0.08 pound per MM Btu when burning natural gas only.



Applicable Compliance Method

If required, compliance with the NO_x emission limitations above shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 7, 7a, 7c, 7d or 7e of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-110-03(B)]

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified Permit to Install (PTI) prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

3. P007, Latex

Operations, Property and/or Equipment Description:

Latex - Synthetic Rubber Latex Manufacturing - polymerizers, blowdown tanks, concentrators, blend tanks, etc.

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

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(M)(2)	This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound (OC) emissions by an overall control efficiency of at least 85%, by weight. If the reductions are achieved by incineration, 90% or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
b.	40 CFR Part 63, Subpart VVVVV (40 CFR Part 63.11494 – 63.11503)	See Facility-Wide Terms and Conditions Sections B.5.
c.	40 CFR Part 63, Subpart A	The permittee shall comply with the requirements of 40 CFR part 63, subpart A as shown in in Table 9 of Subpart VVVVV.

- (2) Additional Terms and Conditions

a. None.

- c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, an acceptable value for the daily average temperature in the firebox of the natural gas fired boiler (B014) when the emissions unit is in operation shall not be below 1227 degrees Fahrenheit or shall not be below the minimum temperature established during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(A)(3)]

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, an acceptable value for the daily average temperature in the firebox of the natural gas fired boiler (B001) shall not be below 866 degrees Fahrenheit or shall not be below the minimum temperature established during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(A)(3)]

- (3) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature in the firebox of the boiler when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. The identification of the boiler being employed as the control equipment for this emissions unit.
- b. The daily average temperature in the firebox of the boiler that is being employed as the control equipment for this emissions unit.
- c. A log (date and total time) of the downtime or bypass of the capture (collection) system and the boiler, and/or downtime of the monitoring equipment, when the associated emissions unit was in operation.

If all recorded values of the temperature in the firebox are above the minimum established temperature in d)(1) or d)(2) above, the permittee may record that all values were above the minimum temperature rather than calculating and recording the daily average temperature for that operating day.

[Authority for term: OAC rule 3745-77-07(A)(3)]

- (4) Whenever the monitored values for the daily average temperature in the firebox of the boiler deviates from the limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. The date and time the deviation began.



- a. The magnitude of the deviation at that time.
- b. The date the investigation was conducted.
- c. The name(s) of the personnel who conducted the investigation.
- d. The findings and recommendations.

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

- e. A description of the corrective action.
- f. The date corrective action was completed.
- g. The date and time the deviation ended.
- h. The total period of time (in minutes) during which there was a deviation.
- i. The temperature readings immediately after the corrective action was implemented.
- j. The name(s) of the personnel who performed the work.

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

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

[Authority for term: OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All days which the daily average temperature in the firebox of the natural gas fired boiler (B014) does not comply with the temperature limitation specified above.
 - b. All days which the daily average temperature in the firebox of the natural gas fired boiler (B001) does not comply with the temperature limitation specified above.



- c. Any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to one of the boilers.
- d. Each incident of deviation described in “a”, “b” or “c” (above) where a prompt investigation was not conducted.
- e. Each incident of deviation described in “a”, “b” or “c” where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the boiler into compliance with the acceptable limit, was determined to be necessary and was not taken.
- f. Each incident of deviation described in “a”, “b” or “c” where proper records were not maintained for the investigation and/or the corrective action(s).

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

[Authority for term: OAC rule 3745-77-07(A)(3)]

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

[Authority of Term: OAC rule 3745-15-03(A)]

f) **Testing Requirements**

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

- a. Emissions Limitation

This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the OC emissions by an overall control efficiency of at least 85%, by weight. If the reductions are achieved by incineration, 90% or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

Applicable Compliance Method

If required, compliance with the OC emission limitations above shall be based on the results of emission testing conducted in accordance with Methods 1-4 and 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- b. Emissions Limitation

The overall control efficiency shall exceed 85% by weight for OC.

Applicable Compliance Method

Compliance with the overall control efficiency limitation for OC above shall be determined in accordance with f)(2), below .

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-07(M)(2)]



- (2) The permittee shall conduct emissions testing to demonstrate compliance with the overall control efficiency limitation for VOC:
- a. The emission testing shall be conducted approximately 3 months after issuance of the permit (following the effective date for the Title V permit).
 - b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emissions rate(s) for VOC, Methods 1-4 and 25 or 25-A. as appropriate, of 40 CFR Part 60, Appendix A.

The control efficiency (that is, the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined per the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and the total concentration, and on a consideration of the potential presence of interfering gases.
 - c. During the emissions testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio DO/LAA. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.) or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under *worst case* conditions expected during the life of the permit. As part of the information provided in the Intent to Test (ITT) notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe *worst case* operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA DO/LAA that the proposed operating conditions constitute *worst case*. Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.
 - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an ITT notification to the appropriate Ohio EPA DO/LAA. The ITT notification shall describe in detail the proposed test methods and procedures, the EU 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 Ohio EPA DO/LAA's refusal to accept the results of the emission test(s).
 - e. Personnel from the appropriate Ohio EPA DO/LAA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU and/or the performance of the control equipment.
 - f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person(s) responsible for the tests and submitted to the appropriate Ohio EPA DO/LAA 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 appropriate Ohio EPA DO/LAA.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

4. P020, RLP

Operations, Property and/or Equipment Description:

RLP - Reactive Liquid Polymers - reactors, processing vessels, product purification, finishing, and raw material recovery

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

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	9.6 tons of volatile organic compounds (VOC) per year The overall control efficiency shall exceed 85% by weight for VOC.
b.	40 CFR Part 63, Subpart VVVVV (40 CFR Part 63.11494 – 63.11503)	See Facility-Wide Terms and Conditions Sections B.5.
c.	40 CFR Part 63, Subpart A	The permittee shall comply with the requirements of 40 CFR part 63, subpart A as shown in in Table 9 of Subpart VVVVV.

- (2) Additional Terms and Conditions

a. None.

- c) Operational Restrictions

(1) None.

- d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, an acceptable value for the daily average temperature in the firebox of the thermal oxidizer shall not be below 1566 degrees Fahrenheit or shall not be below the minimum temperature established during the most recent emission test that demonstrated the emissions



unit was in compliance when emissions unit P020 is in operation and venting emissions to the thermal oxidizer.

[Authority for term: OAC rule 3745-77-07(A)(3)]

- (2) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature in the firebox of the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. The daily average temperature in the firebox of the thermal oxidizer when emissions unit P020 is in operation and venting to the thermal oxidizer.
- b. A log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit was in operation.

If all recorded values of the temperature in the firebox are above the minimum established temperature in d)(1) or d)(2) above, the permittee may record that all values were above the minimum temperature rather than calculating and recording the daily average temperature for that operating day.

[Authority for term: OAC rule 3745-77-07(A)(3)]

- (3) Whenever the monitored the daily average temperature in the firebox of the thermal oxidizer deviates from the limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. The date and time the deviation began.
 - b. The magnitude of the deviation at that time.
 - c. The date the investigation was conducted.
 - d. The name(s) of the personnel who conducted the investigation.
 - e. The findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the



deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. A description of the corrective action.
- g. The date corrective action was completed.
- h. The date and time the deviation ended.
- i. The total period of time (in minutes) during which there was a deviation.
- j. The temperature readings immediately after the corrective action was implemented.
- k. The name(s) of the personnel who performed the work.

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

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

[Authority for term: OAC rule 3745-77-07(A)(3)]

- (4) The permittee shall collect and record the following information for this emissions unit each month:
- a. The amount of volatile organic material charged, in pounds or ton(s).
 - b. The amount of volatile organic material converted to product, in pounds or ton(s).
 - c. The amount of volatile organic material recovered, in pounds or ton(s).
 - d. The amount of volatile organic material converted to waste, in pounds or ton(s).
 - e. The amount of volatile organic material sent to the oxidizer (i.e., d)(4)a. minus d)(4)b. minus d)(4)c. minus d)(4)d. minus d)(4)f. minus d)(4)g.), in pounds or ton(s).
 - f. The fugitive VOC emissions, in pounds or ton(s).
 - g. Hose VOC emissions, in pounds or ton(s).
 - h. The amount of volatile organic compounds emitted from the thermal oxidizer (i.e., d)(3)e. times (1- the destruction efficiency)) , in pounds or ton(s).
 - i. The total VOC emission rate (i.e., d)(4)f. plus d)(4)g. plus d)(4)h.), in pounds or ton(s).

[Authority for term: OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All the days which the daily average temperature in the firebox of the thermal oxidizer when emissions unit P020 is in operation and venting to the thermal oxidizer did not comply with the temperature limitation specified above.
 - b. Any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal oxidizer.
 - c. Each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted.
 - d. Each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable limit, was determined to be necessary and was not taken.
 - e. Each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s).

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

[Authority for term: OAC rule 3745-77-07(A)(3)]

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

[Authority of Term: OAC rule 3745-15-03(A)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
9.6 tons of VOC per year
Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation shall be determined by the record keeping requirements specified in d)(4) above.
 - b. Emission Limitation:
The overall control efficiency shall exceed 85% by weight for VOC.
Applicable Compliance Method
Compliance with the overall control efficiency limitation for VOC above shall be determined in accordance with f)(2), below.



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

- (2) The permittee shall conduct emissions testing to demonstrate compliance with the overall control efficiency limitation for VOC:
- a. The emission testing shall be conducted approximately 3 months after issuance of the permit (following the effective date for the Title V permit).

- b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emissions rate(s) for VOC, Methods 1-4 and 25 or 25-A. as appropriate, of 40 CFR Part 60, Appendix A.

The control efficiency (that is, the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined per the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and the total concentration, and on a consideration of the potential presence of interfering gases.

- c. During the emissions testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio DO/LAA. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.) or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under *worst case* conditions expected during the life of the permit. As part of the information provided in the Intent to Test (ITT) notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe *worst case* operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA DO/LAA that the proposed operating conditions constitute *worst case*. Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.
- d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an ITT notification to the appropriate Ohio EPA DO/LAA. The ITT notification shall describe in detail the proposed test methods and procedures, the EU 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 Ohio EPA DO/LAA's refusal to accept the results of the emission test(s).
- e. Personnel from the appropriate Ohio EPA DO/LAA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU and/or the performance of the control equipment.



- f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person(s) responsible for the tests and submitted to the appropriate Ohio EPA DO/LAA 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 appropriate Ohio EPA DO/LAA.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.