



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

08/12/05

**RE: Proposed Title V Chapter 3745-77 Permit
16-77-02-0009
PPG INDUSTRIES - BARBERTON PLANT**

Attn: Genevieve Damico AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for PPG INDUSTRIES - BARBERTON PLANT, has been created in Ohio EPA's State Air Resources System (STARS) on 08/12/05, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

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

cc: Akron Air Pollution Control
File, DAPC PMU



State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 08/12/05	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 16-77-02-0009 to:
 PPG INDUSTRIES - BARBERTON PLANT
 PPG Industries, Inc.
 4829 Fairland Road
 Barberton, OH 44203-3913

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

P110 (Teslin Line 2) Line 2; Mixer, Blender, Extruder, Extractor, Drying Oven; Teslin	P114 (Teslin Line 3) Line 3; Mixer, Blender, Extruder, Extractor, Drying Oven; Teslin
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You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. 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, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Akron Air Pollution Control
 146 South High Street, Room 904
 Akron, OH 44308
 (330) 375-2480

OHIO ENVIRONMENTAL PROTECTION AGENCY

Joseph P. Koncelik
 Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. 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 A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

- i. The date, place (as defined in the permit), and time of sampling or measurements.
- ii. The date(s) analyses were performed.
- iii. The company or entity that performed the analyses.
- iv. The analytical techniques or methods used.
- v. The results of such analyses.
- vi. 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:

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

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

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

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

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

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

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General 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 General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

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

- iii. **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 General Term and Condition A.1.c.ii 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; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A 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 General Term and Condition A.1.c.ii 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))

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

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

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

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

2. **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 General Term and Condition A.1.c.i above.

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

3. **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))

4. **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))

5. 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))

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 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 upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
 - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

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

7. 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))

8. 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))

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

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

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

11. 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))

12. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. 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))

13. 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))

14. Operational Flexibility

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

Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. 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))

16. Off-Permit Changes

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

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

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

17. Compliance Method Requirements

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

18. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. 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))

20. 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))

21. Permanent Shutdown of an Emissions Unit

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

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

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

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

22. Title VI Provisions

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

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

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

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

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

2. Records Retention Requirements

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

3. 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.

4. Scheduled Maintenance/Malfunction Reporting

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

5. Permit Transfers

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

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

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

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

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

B019 - no. 1 Teslin boiler, 6.28 mmBtu/hr, natural gas-fired;
B020 - no. 2 Teslin boiler, 6.28 mmBtu/hr, natural gas-fired;
B021 - no. 3 Teslin boiler, 6.28 mmBtu/hr, natural gas-fired;
B022 - no. 4 Teslin boiler, 6.28 mmBtu/hr, natural gas-fired;
B023 - no. 5 Teslin boiler, 6.28 mmBtu/hr, natural gas-fired;
B024 - no. 6 Teslin boiler, 6.28 mmBtu/hr, natural gas-fired;
P111 - bulk unloading and storage, three silos, pneumatic conveying system (Permit to Install 16-0818);
T044 - oil tank, 8,000-gallon (Permit to Install 16-01330); and
T045 - oil tank, 2,000-gallon (Permit to Install 16-01330).

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

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z049 - T391 - polyolefin silo, PPG no. 38193;
Z048 - T392 - polyolefin silo, PPG no. 38914;
Z050 - T393 - silica silo; and
Z051 - T420 - ethylene glycol coolant tank.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Teslin Line 2 (P110)

Activity Description: Line 2; Mixer, Blender, Extruder, Extractor, Drying Oven; Teslin

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Teslin line #2 - mixer, blender, extruder, extractor, drying oven	OAC rule 3745-31-05(A)(3) (PTI 16-01776)	<p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07, 3745-17-11, and 3745-21-07(G)(2).</p> <p>Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.</p> <p>0.8 lb/hr of organic compounds (OC) and 3.5 tpy of OC (vent emissions from P110 - S01 stack)</p> <p>90% reduction of organic compounds (OC) (combined stack and fugitive emissions)</p> <p>fugitive OC emissions are limited to 191 lbs/day and 33.8 tpy</p> <p>2.49 lbs/hr of particulate emissions 10.9 tpy of particulate emissions</p> <p>See A.I.2.a - A.I.2.c below.</p> <p>The applicable emission limitations specified in these rules are either equivalent to or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).</p>
	OAC rule 3745-17-07 OAC rule 3745-17-11 OAC rule 3745-21-07(G)(2)	

2. Additional Terms and Conditions

- 2.a** The mixer shall be adequately enclosed and shall vent all particulate emissions to a baghouse.
- 2.b** The calender rollers and extruder shall be equipped with a Smog Hog or equivalent device to control particulate emissions generated from plastic sheet formation.

2. Additional Terms and Conditions (continued)

- 2.c** The extruder, oil separator, extractor, drying oven, and TCE stripping unit shall be vented to a carbon adsorption unit to control organic emissions.

II. Operational Restrictions

- 1.** The pressure drop across the baghouse shall be maintained within the range of 0.5 to 6 inches of water while the emissions unit is in operation.

Operation of the baghouse outside of the specified pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

[Authority for term: PTI 16-01776]

III. Monitoring and/or Record Keeping Requirements

- 1.** The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), and any modifications deemed necessary by the permittee. The permittee shall record the pressure drop across the baghouse on a daily basis.

[Authority for term: PTI 16-01776]

- 2.** The permittee shall calculate and record, on a daily basis, the fugitive emissions, stack emissions, and overall control efficiency for organic compounds (combined stack and fugitive emissions) for this emissions unit. Fugitive emissions, stack emissions, and overall control efficiency shall be calculated based upon the methodology specified in section A.V.1.c.

[Authority for term: PTI 16-01776]

- 3.** The permittee shall calculate and record, on an annual basis, the fugitive emissions of OC from the emissions unit. Fugitive emissions shall be calculated using the methodology specified in section A.V.1.e.

[Authority for term: PTI 16-01776]

- 4.** The permittee shall calculate and record, on an annual basis, the mass emissions of particulates from emissions units P110 and P114.

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

- 5.** The permittee shall collect and record the following information for the equipment used to control organic compound emissions each operating day:

a. a log or record of downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit(s) was (were) in operation.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. Any day during which the pressure drop across the baghouse was less than 0.5 inch or more than 6 inches of water while the emissions unit was in operation.
 - b. Each day during which the organic compound emissions were not reduced by at least 90%, and the actual reduction amount for each such day, as calculated based upon the methodology specified in section A.V.1.c.

The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

[Authority for term: PTI 16-01776]

2. The permittee shall submit annual reports that specify the total vent emissions of OC, the total fugitive emissions of OC, and the total particulate emissions for this emissions unit for the previous calendar year. These reports shall include the emission calculations and shall be submitted by April 30 of each year.

[Authority for term: PTI 16-01776]

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated by visible particulate emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appenidx A, Method 9.

[Authority for term: PTI 16-01776]

1.b Emission Limitations:

2.49 lbs/hr of particulate emissions
10.9 tpy

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing an emission test in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

The tpy emission limitation was developed by multiplying the short-term allowable PE limitation (2.49 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI 16-01776]

1.c Emission Limitation:

90% overall reduction of organic compounds (OC) (combined stack and fugitive emissions)

Applicable Compliance Method:

Compliance with the 90% reduction for OC shall be determined by the record keeping requirements specified in section A.III.2.

V. Testing Requirements (continued)

Overall control efficiency shall be calculated daily in accordance with the following methodology:

Input Parameters:

D = density of TCE makeup pumped into day tank (lbs/gal) [handbook value]

M = virgin TCE makeup pumped into day tank (gallons) [tallied each time material is transferred]

W = waste TCE removed from process (lbs) [recorded on waste manifest for each drum of material removed]

Rads = TCE emission rate from carbon adsorber (lbs/hr) [the TCE emission rate measured during the most recent emission test]

H = time of Teslin production operation on the line that is in operation for the longer period of time (i.e., record the hours of operation for each line, and H = the higher of the two lines) (hrs) [production records]

R = TCE recovered from the carbon adsorber, in lbs/day

1. Calculate daily point source emissions from the combined operation of Line 3 and Line 2: (lbs)

$E_{ads} = H \times R_{ads}$

2. Perform daily calculation of TCE added to system (total emissions): (lbs)

$E_{tot} = MD - W$

3. Calculate total air emissions as a rolling, 30-day summation: (lbs)

$E_{tot30} = \text{Summation}_{30}(E_{tot})$ (for day plus previous 29 days)

4. Calculate point source emissions as a rolling, 30-day summation: (lbs)

$E_{ads30} = \text{Summation}_{30} E_{ads}$ (for day plus previous 29 days)

5. Calculate fugitive emissions as a rolling, 30-day summation: (lbs)

$E_{fug30} = E_{tot30} - E_{ads30}$

6. Calculate daily average fugitive emissions: (lbs)

$E_{fug \text{ daily}} = E_{fug30} / 30$

7. Calculate daily average fugitive emissions from Line 3: (lbs)

$E_{fug \text{ daily L3}} = E_{fug \text{ daily}} / 2$

8. Calculate daily average fugitive emissions from Line 2: (lbs)

$E_{fug \text{ daily L2}} = E_{fug \text{ daily}} / 2$

If either Line 3 or Line 2 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

V. Testing Requirements (continued)

9. Calculate TCE recovered from the carbon adsorber as a rolling, 30-day summation: (lbs)

$R_{30} = \text{Summation}_{30}(R)$ (for day plus previous 29 days)

10. Calculate daily average amount of TCE recovered from the carbon adsorber: (lbs)

$R_{\text{avg daily}} = R_{30} / 30$

11. Overall removal efficiency (%) shall be calculated daily in accordance with the following methodology and compared to the allowable value of 90%:

$\text{Overall removal efficiency} = [R_{\text{avg daily}} / (R_{\text{avg daily}} + E_{\text{tot}30} / 30)] * 100\%$

[Authority for term: PTI 16-01776]

1.d Emission Limitations:

0.8 lb/hr of OC (vent emissions from P110-S01 stack)

3.5 tpy of OC (vent emissions from P110-S01 stack)

Applicable Compliance Method:

Compliance with the allowable hourly mass emission rate for OC shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18 and the applicable procedures in OAC rule 3745-21-10(C).

Annual emissions shall be calculated in accordance with the following methodology:

Input Parameters:

$R_{\text{ads}} = \text{TCE emission rate from carbon adsorber (lbs/hr)}$ [the TCE emission rate measured during the most recent emission test]

$H = \text{time of Teslin production operation on the line that is in operation for the longer period of time (i.e., record the hours of operation for each line, and } H = \text{the higher of the two lines) (hrs)}$ [production records]

1. Calculate daily point source emissions from the combined operation of Line 3 and Line 2: (lbs)

$E_{\text{ads}} = H \times R_{\text{ads}}$

2. Calculate point source emissions as a rolling, 30-day summation: (lbs)

$E_{\text{ads}30} = \text{Summation}_{30} E_{\text{ads}}$ (for day plus previous 29 days)

3. Calculate year-to-date vent emissions from the combined operation of Line 3 and Line 2: (tons)

$E_{\text{ads ytd}} = [\text{SUMMATION}_{\text{ytd}}(E_{\text{ads}})] / 2000$

[Authority for term: PTI 16-01776]

1.e Emission Limitations:

191 lbs/day fugitive OC emissions from P110

33.8 tpy fugitive OC emissions from P110

Applicable Compliance Method:

Compliance shall be demonstrated by a material balance calculation to determine fugitive losses. The methodology to determine fugitive losses is stated below:

V. Testing Requirements (continued)

Input Parameters:

D = density of TCE makeup pumped into day tank (lbs/gal) [handbook value]

M = virgin TCE makeup pumped into day tank (gallons) [tallied each time material is transferred]

W = waste TCE removed from process (lbs) [recorded on waste manifest for each drum of material removed]

Rads = TCE emission rate from carbon adsorber (lbs/hr) [the TCE emission rate measured during the most recent emission test]

H = time of Teslin production operation on the line that is in operation for the longer period of time (i.e., record the hours of operation for each line, and H = the higher of the two lines) (hrs) [production records]

R = TCE recovered from the carbon adsorber, in lbs/day

1. Calculate daily point source emissions from the combined operation of Line 3 and Line 2: (lbs)

$E_{ads} = H \times Rads$

2. Perform daily calculation of TCE added to system (total emissions): (lbs)

$E_{tot} = MD - W$

3. Calculate total air emissions as a rolling, 30-day summation: (lbs)

$E_{tot30} = \text{Summation}_{30}(E_{tot})$ (for day plus previous 29 days)

4. Calculate point source emissions as a rolling, 30-day summation: (lbs)

$E_{ads30} = \text{Summation}_{30} E_{ads}$ (for day plus previous 29 days)

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 16-01776]

5. Calculate fugitive emissions as a rolling, 30-day summation: (lbs)

$E_{fug30} = E_{tot30} - E_{ads30}$

6. Calculate daily average fugitive emissions: (lbs)

$E_{fug \text{ daily}} = E_{fug30} / 30$

7. Calculate daily average fugitive emissions from Line 2: (lbs)

$E_{fug \text{ daily L2}} = (E_{fug \text{ daily}}) / 2$

8. Calculate year-to-date fugitive emissions from Line 2: (tons)

$E_{fug \text{ ytd L2}} = [\text{SUMMATION}_{ytd}(E_{fug \text{ daily L2}})] / 2000$

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

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted within 3 months after the effective date of this permit, approximately 2.5 years after the effective date of this permit, and within 6 months prior to permit expiration.
 - The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rate for organic compounds.
 - The following test method(s) shall be employed to demonstrate compliance:

for organic compounds, Methods 1 through 4 and 18 of 40 CFR Part 60, Appendix A and Part III, section (A)(V)(2)(e)

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

e. If the emission testing is conducted simultaneously for both emissions units, P110 and P114, emission testing for each individual line shall not be required.

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

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

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD 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 Akron RAQMD.

[Authority for term: PTI 16-01776]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Teslin Line 3 (P114)

Activity Description: Line 3; Mixer, Blender, Extruder, Extractor, Drying Oven; Teslin

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P114- Teslin Line 3 - production Line 3 for teslin synthetic printing sheet - mixer, extruder, calender, extractor, dryer, drying oven, TCE recovery	OAC rule 3745-31-05(A)(3) (PTI 16-01955)	<p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-28, 40 CFR Part 63, OAC rule 3745-17-07, OAC rule 3745-17-11, OAC rule 3745-21-07(G)(2), and 40 CFR Part 64.</p> <p>Visible particulate emissions shall not exceed 5% opacity as a 6-minute average from stacks P108-S01 and P114-S02.</p> <p>Particulate emissions shall not exceed 0.03 gr/scf of exhaust gasses from baghouse controlling dry material handling (stack P108-S01).</p> <p>0.5 lb/hr particulates (combined emissions from stacks P108-S01 and P114-S02) 2.2 tpy particulates</p> <p>9.0 lbs/hr trichloroethylene/organic compounds (TCE/OC) (combined stack and fugitive emissions) 39.4 tpy TCE/OC (combined stack and fugitive emissions)</p> <p>See A.I.2.a - A.I.2.c below.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-28 and 40 CFR Part 63	<p>90% reduction of TCE, as a 30-day rolling average calculated on a daily basis (combined stack and fugitive emissions)</p> <p>99% control efficiency of carbon adsorption unit, or 5 ppm outlet gas concentration</p> <p>Primary process enclosures (mixer, extractor, dryer oven) See A.II.2 and A.II.3 below.</p>
	OAC rule 3745-17-07(A)	<p>Leak detection and repair program (LDAR) See A.I.2.d below.</p> <p>See A.I.2.e - A.I.2.g below. See A.I.2.h below.</p>
	OAC rule 3745-17-11(B)	See A.I.2.h below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-28 for TCE (all OC emitted is TCE).
	40 CFR Part 64	See A.III.2, A.III.29, A.IV.1.c, and A.IV.2 below.

2. Additional Terms and Conditions

- 2.a** The mixer shall be adequately enclosed and shall vent all particulate emissions to a baghouse.
- 2.b** Calender rollers and extruder shall be equipped with a Smog Hog or equivalent device to control particulate emissions generated from plastic sheet formation.
- 2.c** The extruder, oil separator, extractor, drying oven, and TCE/OC stripping unit shall be vented to a carbon adsorption unit to control organic emissions.
- 2.d** The leak detection and repair program pertains to any type of pump, compressor, pressure relief device, sampling connection system, open-ended valve, flange, connector, closed vent system, and any other device or system in volatile organic compound (VOC) service within the Teslin Line #3 equipment and any equipment shared between Teslin Line #3 and any other Teslin line(s).
- 2.e** The extractor and dryer operating-zone lids shall be enclosed with a hood and vented to the carbon adsorption unit (CAU).
- 2.f** All doors and lids on the extractor, dryer, and oven shall be equipped with gaskets, water seals, or toggle clamps.
- 2.g** The entrance to the extractor and the exit from the dryer shall be adequately elevated above the unit to minimize fugitive emissions of TCE/OC.
- 2.h** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 0.5 to 6.0 inches of water while the emissions unit is in operation.

Operation of the baghouse outside of the specified pressure drop range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

[Authority for term: PTI 16-01955]

2. The primary process enclosures, defined as the mixer, extractor, dryer, and oven, shall be totally enclosed such that TCE/OC emissions are captured and contained for discharge to the carbon adsorption unit. Compliance with the following criteria, identified by USEPA Method 204, shall satisfy the total enclosure requirement:

- a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each TCE/OC emitting point unless otherwise specified by the Administrator.

- b. The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.

- c. The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure.

- d. All access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.

- e. All TCE/OC emissions must be captured and contained for discharge through a control device.

[Authority for term: PTI 16-01955, OAC rule 3745-31-28 and 40 CFR Part 63]

3. The primary process enclosures shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, whenever the emissions unit is in operation. This value has been determined to be equivalent to 200 fpm average facial velocity at standard temperature.

[Authority for term: PTI 16-01955, OAC rule 3745-31-28 and 40 CFR Part 63]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s) and any modifications deemed necessary by the permittee. The permittee shall record the pressure drop across the baghouse on a daily basis.

[Authority for term: PTI 16-01955]

2. The permittee shall calculate and record, on a daily basis, the combined stack and fugitive emissions and overall control efficiency for organic compounds (combined stack and fugitive emissions) for this emissions unit. The combined stack and fugitive emissions, and overall control efficiency shall be calculated based upon the methodology specified in section A.V.1.

[Authority for term: PTI 16-01955 and 40 CFR Part 64]

3. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the primary process enclosures. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, and any modifications deemed necessary by the permittee.

[Authority for term: PTI 16-01955]

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall record and maintain the following information on a daily basis:
- the difference in pressure between the primary process enclosures and the surrounding area(s); and
 - a log or record of downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

[Authority for term: PTI 16-01955]

5. The permittee shall calculate and record, on an annual basis, the fugitive and stack emissions of TCE/OC from the emissions unit. Fugitive emissions shall be calculated using the methodology specified in section A.V.1.e.

[Authority for term: PTI 16-01955]

6. Except as otherwise provided in sections A.III.7 and A.III.8, equipment shall be monitored for leaks in accordance with the method specified in OAC rule 3745-21-10(F), as follows:

- Any pump in light liquid service shall be monitored monthly.
- Any valve in gas/vapor service or in light liquid service shall be monitored monthly, except that quarterly monitoring may be employed anytime after no leaks are detected during two consecutive months. The quarterly monitoring shall begin with the next calendar quarter following the two consecutive months of no detected leaks and shall be conducted in the first month of each calendar quarter. The quarterly monitoring may continue until a leak is detected, at which time monthly monitoring shall be employed again.
- Any of the following equipment shall be monitored within five calendar days after evidence of a leak or potential leak from the equipment by visual, audible, olfactory, or other detection method:
 - any pump in heavy liquid service;
 - any valve in heavy liquid service;
 - any pressure relief device in light liquid service or in heavy liquid service; and
 - any flange or other connector.
- Any equipment in which a leak is detected as described in section A.III.11 shall be monitored within five working days after each attempt to repair, unless the owner or operator believes that the equipment was not successfully repaired.

[Authority for term: PTI 16-01955]

7. For any valve in gas/vapor service or in light liquid service, an alternative monitoring schedule may be employed in lieu of the monitoring schedule specified in section A.III.6.b provided the valve is designated as unsafe to monitor and is monitored as frequently as practical during safe to monitor times, provided the following conditions are met:

- the permittee of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of monitoring on a monthly basis; and
- the permittee of the valve adheres to a written plan that requires monitoring of the valve as frequently as practical during safe to monitor times.

[Authority for term: PTI 16-01955]

III. Monitoring and/or Record Keeping Requirements (continued)

8. Excluded from the monitoring requirements of section A.III.6 are the following equipment:
- a. any pump that has no externally actuated shaft penetrating the pump housing and that is designated for no detectable emissions as provided in section A.III.21;
 - b. any pump that is equipped with a dual mechanical seal which has a barrier fluid system and sensor that comply with the requirements specified in section A.III.22;
 - c. any valve that has no externally actuated stem penetrating the valve and that is designated for no detectable emissions as provided in section A.III.21.

[Authority for term: PTI 16-01955]

9. Any pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.

[Authority for term: PTI 16-01955]

10. Any sensor employed pursuant to section A.III.8.b or A.III.17.b shall be checked daily, unless the sensor is equipped with an audible alarm.

[Authority for term: PTI 16-01955]

11. A leak is detected:

- a. when a concentration of ten thousand ppmv or greater is measured from a potential leak interface of any equipment that is monitored for leaks using the method in OAC rule 3745-21-10(F);
- b. when there is an indication of liquids dripping from the seal of a pump in light liquid service; or
- c. when a sensor employed pursuant to section A.III.8.b or A.III.17.b indicates failure of the seal system, the barrier fluid system, or both.

[Authority for term: PTI 16-01955]

12. When a leak is detected as described in section A.III.11, the following procedures shall be followed:

- a. a weatherproof and readily visible identification tag, marked with the equipment identification number, is immediately attached to the leaking equipment;
- b. a record of the leak and any attempt to repair the leak is entered into the leak repair log kept pursuant to section A.III.15;
- c. the identification tag attached to the leaking equipment, other than a valve that is monitored pursuant to section A.III.6.b, may be removed after the leaking equipment is repaired; and
- d. the identification tag attached to a leaking valve that is monitored pursuant to section A.III.6.b may be removed after the leaking valve is repaired, monitored for leaks for two consecutive months as specified in section A.III.6.b, and found to have no detected leaks during those two consecutive months.

[Authority for term: PTI 16-01955]

13. When a leak is detected as described in section A.III.11, the leaking equipment shall be repaired as soon as practicable, but no later than fifteen calendar days after the leak is detected, except for a delay of repair as provided in section A.III.24. Leaking equipment shall be deemed repaired if the maximum concentration measured pursuant to section A.III.6.d is less than ten thousand ppmv.

[Authority for term: PTI 16-01955]

III. Monitoring and/or Record Keeping Requirements (continued)

14. When a leak is detected as described in section A.III.11, a first attempt at repair shall be made no later than five calendar days after the leak is detected; and the first attempts at repair shall include, but are not limited to, the following best practices where practicable:
- a. tightening of bonnet bolts;
 - b. replacement of bonnet bolts;
 - c. tightening of packing gland nuts; and
 - d. injection of lubricant into lubricated packing.

[Authority for term: PTI 16-01955]

15. When a leak is detected as described section A.III.11, the following information shall be recorded in a leak repair log:
- a. the identification number of the leaking equipment and, for leaks based on monitoring, the identification numbers of the leak detection instrument and its operator;
 - b. the basis for the detection of the leak; for example, monitoring, visual inspection, or sensor;
 - c. the date on which the leak was detected and the date of each attempt to repair the leaking equipment;
 - d. the methods of repair applied in each attempt to repair the leaking equipment;
 - e. one of the following entries within five working days after each attempt to repair the leaking equipment:
 - i. "not monitored," denoting the leaking equipment was presumed to still be leaking and it was not monitored; or
 - ii. if the leaking equipment was monitored with a leak detection instrument, the maximum concentration that was measured as follows:
 - (a) the actual reading in ppmv; or
 - (b) "below 10,000," denoting less than ten thousand ppmv; or
 - (c) "above 10,000," denoting not less than ten thousand ppmv;
 - f. if the leak is not repaired within fifteen calendar days after the date on which it was detected:
 - i. "repair delayed" and the reason for the delay;
 - ii. if repair is being delayed until the next process unit shutdown due to technical infeasibility of repair, the signature of the permittee whose decision it was that repair is technically infeasible without a process unit shutdown;
 - iii. the expected date of successful repair of the leak; and
 - iv. the dates of process unit shutdowns that occur while the leaking equipment is unrepaired; and
 - v. the date on which the leak was successfully repaired.

[Authority for term: PTI 16-01955]

III. Monitoring and/or Record Keeping Requirements (continued)

16. The leak repair log shall be retained by the permittee of the process unit in a readily accessible location for a minimum of two years after the date on which the record was made.

[Authority for term: PTI 16-01955]

17. Monitoring requirements for compressors:

- a. Except as otherwise provided in section A.III.17.c, any compressor in the process unit shall comply with the requirements specified in section A.III.17.b.
- b. The compressor shall be equipped with a seal that has a barrier fluid system and sensor which comply with the requirements specified in section A.III.22.
- c. Excluded from the requirements of section A.III.17.b is any compressor that is designated for no detectable emissions as provided in A.III.21.

[Authority for term: PTI 16-01955]

18. Monitoring requirements for pressure relief devices in gas/vapor service.

- a. Any pressure relief device in gas/vapor service in the process unit shall comply with the requirements specified in sections A.III.18.b to A.III.18.d.
- b. Except during pressure releases, the pressure relief device shall be operated with no detectable emissions, as indicated by an instrument reading of less than five hundred ppmv above background, as measured by the method specified in OAC rule 3745-21-10(F).
- c. No later than five calendar days after a pressure release, the pressure relief device shall be tested to confirm the condition of no detectable emissions in accordance with the method specified in OAC rule 3745-21-10(F).
- d. After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions as soon as practicable, but no later than five calendar days after the pressure release, except for a delay of repair as provided in section A.III.24.

[Authority for term: PTI 16-01955]

19. Monitoring requirements for sampling connection system.

- a. Except as otherwise provided in section A.III.19.c, any sampling connection system in the process unit shall comply with the requirements specified in section A.III.19.b.
- b. The sampling connection system shall be equipped with a closed purge system or a closed vent system that meets one of the following requirements:
- i. the purged process fluid is returned directly to the process line with zero VOC emissions to the ambient air;
or
- ii. the purged process fluid is collected and recycled with zero VOC emissions to the ambient air.
- c. Excluded from the requirements of section A.III.19.b is any sampling connection system that is an in-situ sampling system.

[Authority for term: PTI 16-01955]

III. Monitoring and/or Record Keeping Requirements (continued)

20. Monitoring requirements for open-ended valves or lines.

- a. Any open-ended valve or line in the process unit shall be equipped with a cap, blind flange, plug, or second valve and shall comply with the requirements specified in sections A.III.20.b to A.III.20.d.
- b. Except during operations requiring the flow of process fluid through the open-ended valve or line, the cap, blind flange, plug, or second valve shall seal the open end of the open-ended valve or line.
- c. If equipped with a second valve, the open-ended valve or line shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
- d. If a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves, but shall comply with section A.III.20.b at all other times.

[Authority for term: PTI 16-01955]

21. Monitoring requirements for equipment designated for no detectable emissions.

- a. Any equipment (pump, valve, or compressor) designated for no detectable emissions pursuant to section A.III.8.a, A.III.8.c or A.III.17.c shall comply with the requirements specified in sections A.III.21.b to A.III.21.d.
- b. The equipment shall be operated with no detectable emissions as indicated by an instrument reading of less than five hundred ppmv above background as measured by the method specified in OAC rule 3745-21-10(F).
- c. The equipment shall be tested for compliance with section A.III.21.b initially upon designation and annually.
- d. The designation of the equipment shall be signed by the permittee of the equipment in the log kept pursuant to section A.III.25.

[Authority for term: PTI 16-01955]

22. Monitoring requirements for barrier fluid systems and sensors for pumps and compressors.

- a. When a pump or compressor is equipped with a seal that has a barrier fluid system and sensor which are employed to meet the requirements of section A.III.8.b or A.III.17.a, the requirements of sections A.III.22.b to A.III.22.d shall be met.
- b. The barrier fluid system shall meet one of the following conditions:
 - i. the barrier fluid system is operated with a barrier fluid at a pressure that is at all times greater than the stuffing box pressure of the pump or compressor; or
 - ii. the barrier fluid system is equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the ambient air.
- c. The barrier fluid system shall be in heavy liquid service or shall not be in VOC service.
- d. The barrier fluid system shall be equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both based on criteria determined by the permittee from design considerations and operating experience.

[Authority for term: PTI 16-01955]

III. Monitoring and/or Record Keeping Requirements (continued)

23. Monitoring requirements for closed vent systems.

- a. Any closed vent system that is used to comply with the requirements of section A.III.22.b.ii shall comply with the requirements specified in sections A.III.23.b to A.III.23.d.
- b. The closed vent system shall be designed and operated with no detectable emissions, as indicated by an instrument reading of less than five hundred ppmv above background, as measured by the method specified in OAC rule 3745-21-10(F).
- c. The closed vent system shall be tested for compliance with section A.III.23.b initially and annually.
- d. The closed vent system shall be operated at all times when emissions may be vented to it.

[Authority for term: PTI 16-01955]

24. Monitoring requirements for delay of repair.

- a. A delay of repair that is employed pursuant to section A.III.13 or A.III.18.d shall be allowed only as provided in sections A.III.24.b to A.III.24.e.
- b. A delay of repair shall be allowed if the repair is technically infeasible without a process unit shutdown. However, the repair shall occur before the end of the next process unit shutdown.
- c. A delay of repair shall be allowed for a piece of equipment that is isolated from the process and that does not remain in VOC service (for example, isolated from the process and properly purged).
- d. A delay of repair for a pump shall be allowed if:
 - i. the repair requires the use of a dual mechanical seal system and associated barrier fluid system; and
 - ii. the repair is completed as soon as practicable, but no later than six months after the leak was detected.
- e. A delay of repair beyond a process unit shutdown shall be allowed for a valve if a valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. A delay of repair beyond the next process unit shutdown shall not be allowed for that valve unless the next process unit shutdown occurs sooner than six months after the first process unit shutdown.

[Authority for term: PTI 16-01955]

III. Monitoring and/or Record Keeping Requirements (continued)

- 25.** The following information shall be recorded in a log that is kept in a readily accessible location:
- a. a list of identification numbers for equipment subject to the requirements of sections A.I.2.e, and A.III.6 to A.III.23;
 - b. a list of identification numbers for equipment designated for no detectable emissions as provided in section A.III.21, and a signature of the permittee authorizing such designation;
 - c. a list of identification numbers for pressure relief devices subject to section A.III.18;
 - d. a list of identification numbers for closed vent systems subject to section A.III.23; and
 - e. for compliance tests required under sections A.III.18.c, A.III.21.c, and A.III.23.c:
 - i. the date of each compliance test;
 - ii. the background level measured during each compliance test; and
 - iii. the maximum instrument reading measured at the equipment during each compliance test.

[Authority for term: PTI 16-01955]

- 26.** The following information pertaining to valves subject to an alternative monitoring schedule, as provided in section A.III.7, shall be recorded in a log that is kept in a readily accessible location:
- a. a list of identification numbers for valves designated as unsafe to monitor, an explanation for each valve stating why the valve is unsafe to monitor, and the plan for monitoring each valve;
 - b. a list of identification numbers for valves designated as difficult to monitor, an explanation for each valve stating why the valve is difficult to monitor, and the schedule for monitoring each valve; and
 - c. a list of identification numbers for valves subject to the alternative monitoring schedule based on a skip period, a schedule for monitoring, and the percentage of valves leaking during each monitoring period.

[Authority for term: PTI 16-01955]

- 27.** The following information pertaining to barrier fluid systems and sensors described in section A.III.22 shall be recorded in a log that is kept in a readily accessible location:
- a. a list of identification numbers of pumps and compressors equipped with such barrier fluid systems and sensors;
 - b. the criteria that indicate failure of the seal system, the barrier fluid system, or both, as required by section A.III.22.d and an explanation of the criteria; and
 - c. any changes to such criteria and the reasons for the changes.

[Authority for term: PTI 16-01955]

- 28.** The permittee shall calculate and record, on an annual basis, the mass emissions of particulates from emissions unit P114.

[Authority for term: PTI 16-01955]

III. Monitoring and/or Record Keeping Requirements (continued)

29. The CAM plan for this emissions unit has been developed for TCE emissions. The CAM performance indicator for TCE emissions is monitoring the addition of TCE to the Teslin process, minus TCE removed as liquid from the process to obtain a direct measurement of overall system efficiency. When the overall system efficiency drops below 91 percent and/or the calculated hourly emission rate exceeds 8.9 lbs/hr, corrective action (including, but not limited to, an evaluation of the emissions unit and carbon adsorption unit) will be required. Upon detecting an excursion of TCE performance indicator, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion.

If the overall system efficiency drops below 90 percent and/or the calculated hourly emissions rate for TCE exceeds 9.0 lbs/hr for more than 5% of the daily calculations performed each month, the permittee shall develop a Quality Improvement Plan consistent with the requirements specified in 40 CFR Part 64.8.

[Authority for term: 40 CFR Part 64]

30. The permittee shall collect and record the following information for the equipment used to control organic compound emissions each operating day:
- a. a log or record of downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit(s) was (were) in operation.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. All periods of time during which the pressure drop across the baghouse was less than 0.5 inch or more than 6.0 inches of water while the emissions unit was in operation.
- b. All periods of time during which the primary process enclosures were not maintained at the required differential pressure specified above.
- c. Each day during which the organic compound emissions were not reduced by at least 90%, and the actual reduction amount for each such day, as calculated based upon the methodology specified in section A.V.1.c.

The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

[Authority for term: PTI 16-01955 and 40 CFR Part 64 (A.IV.1.c)]

2. The permittee shall submit annual reports that specify the total stack and fugitive emissions of TCE/OC, as calculated based upon the methodology specified in section A.V.1.e, and the total particulate emissions for this emissions unit for the previous calendar year. The reports shall include the emission calculations and shall be submitted by April 30 of each year.

[Authority for term: PTI 16-01955 and 40 CFR Part 64]

IV. Reporting Requirements (continued)

3. Semiannual reports shall be submitted to the Director (the Akron RAQMD) by the first day of February and August and shall include the following information for the preceding semiannual periods:
 - a. the process unit identification;
 - b. the number of pumps in light liquid service excluding those pumps designated for no detectable emissions under the provision of section A.III.8.a;
 - c. the number of valves in gas/vapor service or in light liquid service excluding those valves designated for no detectable emission under the provision of section;
 - d. the number of compressors excluding those compressors designated for no detectable emissions under the provision of section A.III.17.c;
 - e. for each month during the semiannual period:
 - i. the number of pumps in light liquid service for which leaks were detected as described in section A.III.11;
 - ii. the number of pumps in light liquid service for which leaks were not repaired within fifteen calendar days after the date of leak detection;
 - iii. the number of valves in gas/vapor service or in light liquid service for which leaks were detected as described in section A.III.11;
 - iv. the number of valves in gas/vapor service or in light liquid service for which leaks were not repaired within fifteen calendar days after the date of leak detection;
 - v. the number of compressors for which leaks were detected;
 - vi. the number of compressors for which leaks were not repaired within fifteen calendar days after the date of leak detection; and
 - vii. the facts that explain each delay of repair allowed pursuant to section A.III.24; and
 - f. the dates of process unit shutdowns that occurred within the semiannual period.

[Authority for term: PTI 16-01955]

4. For compliance tests required under sections A.III.21.c and A.III.23.c, the requirements of paragraphs (A)(3) and (A)(4) of OAC rule 3745-21-10 (pertaining to notification of intent to test) shall be met. The results of such compliance tests shall be reported to the Akron RAQMD within thirty days after the test date.

[Authority for term: PTI 16-01955]

5. The results of compliance tests required under section A.III.18.c shall be reported semiannually to the Akron RAQMD. The semiannual reports shall be submitted by the first day of February and August and shall include information for the preceding semiannual period.

[Authority for term: PTI 16-01955]

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average from stacks P108-S01 and P114-S02.

Applicable Compliance Method:

Compliance shall be demonstrated by visible particulate emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appenidx A, Method 9.

[Authority for term: PTI 16-01955]

1.b Emission Limitation:

Particulate emissions shall not exceed 0.03 gr/scf of exhaust gases from baghouse controlling dry material handling (stack P108-S01).

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing an emission test in accordance with the procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A.

[Authority for term: PTI 16-01955]

V. Testing Requirements (continued)

1.c Emission Limitation:

90% reduction of TCE, as a rolling, 30-day average calculated on a daily basis (combined stack and fugitive emissions)

Applicable Compliance Method:

Compliance with the 90% reduction for TCE shall be determined by the record keeping requirements specified in A.III.2 and by emission testing in accordance with Methods 1 through 4 and 18 of 40 CFR Part 60, Appendix A.

Overall control efficiency shall be calculated daily in accordance with the following methodology:

Input Parameters:

D = density of TCE makeup pumped into day tank (lbs/gal) [handbook value]

M = virgin TCE makeup pumped into day tank (gallons) [tallied each time material is transferred]

W = waste TCE removed from process (lbs) [recorded on waste manifest for each drum of material removed]

Rads = TCE emission rate from carbon adsorber (lbs/hr) [the TCE emission rate measured during the most recent emission test]

H = time of Teslin production operation on the line that is in operation for the longer period of time (i.e., record the hours of operation for each line, and H = the higher of the two lines) (hrs) [production records]

R = TCE recovered from the carbon adsorber, in lbs/day

i. Calculate daily point source emissions from the combined operation of Line 2 and Line 3: (lbs)

$E_{ads} = H \times Rads$

ii. Perform daily calculation of TCE added to system (total emissions): (lbs)

$E_{tot} = MD - W$

iii. Calculate total air emissions as a rolling, 30-day summation: (lbs)

$E_{tot30} = \text{Summation}_{30}(E_{tot})$ (for day plus previous 29 days)

V. Testing Requirements (continued)

iv. Calculate point source emissions as a rolling, 30-day summation: (lbs)

$E_{ads30} = \text{Summation}_{30} E_{ads}$ (for day plus previous 29 days)

v. Calculate fugitive emissions as a rolling, 30-day summation: (lbs)

$E_{fug30} = E_{tot30} - E_{ads30}$

vi. Calculate daily average fugitive emissions: (lbs)

$E_{fug\ daily} = E_{fug30} / 30$

vii. Calculate daily average fugitive emissions from Line 2: (lbs)

$E_{fug\ daily\ L2} = E_{fug\ daily} / 2$

viii. Calculate daily average fugitive emissions from Line 3: (lbs)

$E_{fug\ daily\ L3} = E_{fug\ daily} / 2$

If either Line 2 or Line 3 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

ix. Calculate TCE recovered from the carbon adsorber as a rolling, 30-day summation: (lbs)

$R_{30} = \text{Summation}_{30}(R)$ (for day plus previous 29 days)

x. Calculate daily average amount of TCE recovered from the carbon adsorber: (lbs)

$R_{avg\ daily} = R_{30} / 30$

xi. Overall removal efficiency (%) shall be calculated daily in accordance with the following methodology and compared to the allowable value of 90%:

$\text{Overall removal efficiency} = [R_{avg\ daily} / (R_{avg\ Daily} + E_{tot30} / 30)] * 100\%$

[Authority for term: PTI 16-01955]

1.d Emission Limitation:

99% control efficiency of carbon adsorption unit, or 5 ppm outlet gas concentration

Applicable Compliance Method:

Compliance shall be demonstrated by performing emission tests in accordance with the procedures specified in Methods 1 through 4 and 18 of 40 CFR Part 60, Appendix A.

[Authority for term: PTI 16-01955]

V. Testing Requirements (continued)

1.e Emission Limitation:

39.4 tpy TCE/OC (combined stack and fugitive emissions)

Applicable Compliance Method:

Annual emissions shall be calculated in accordance with the following methodology:

Input Parameters:

D = density of TCE makeup pumped into day tank (lbs/gal) [handbook value]

M = virgin TCE makeup pumped into day tank (gallons) [tallied each time material is transferred]

W = waste TCE removed from process (lbs) [recorded on waste manifest for each drum of material removed]

Rads = TCE emission rate from carbon adsorber (lbs/hr) [the TCE emission rate measured during the most recent emission test]

H = time of Teslin production operation on the line that is in operation for the longer period of time (i.e., record the hours of operation for each line, and H = the higher of the two lines) (hrs) [production records]

R = TCE recovered from the carbon adsorber, in lbs/day

i. Calculate daily point source emissions from the combined operation of Line 2 and Line 3: (lbs)

$E_{ads} = H \times Rads$

ii. Perform daily calculation of TCE added to system (total emissions): (lbs)

$E_{tot} = MD - W$

iii. Calculate total air emissions as a rolling, 30-day summation: (lbs)

$E_{tot30} = \text{Summation}_{30}(E_{tot})$ (for day plus previous 29 days)

iv. Calculate point source emissions as a rolling, 30-day summation: (lbs)

$E_{ads30} = \text{Summation}_{30} E_{ads}$ (for day plus previous 29 days)

v. Calculate fugitive emissions as a rolling, 30-day summation: (lbs)

$E_{fug30} = E_{tot30} - E_{ads30}$

V. Testing Requirements (continued)

vi. Calculate daily average fugitive emissions: (lbs)

$$E_{fug \text{ daily}} = E_{fug30} / 30$$

vii. Calculate daily average fugitive emissions from Line 3: (lbs)

$$E_{fug \text{ daily L3}} = E_{fug \text{ daily}} / 2$$

If either Line 2 or Line 3 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

viii. Calculate year-to-date fugitive emissions from Line 3: (tons)

$$E_{fug \text{ ytd L3}} = [\text{SUMMATION}_{ytd}(E_{fug \text{ daily L3}})] / 2000$$

ix. Calculate year-to-date combined fugitive and stack emissions from Line 3: (tons)

$$E_{com \text{ ytd L3}} = E_{fug \text{ ytd L3}} + [\text{Rads} * \text{SUMMATION}_{ytd}(H)] / 2000$$

[Authority for term: PTI 16-01955]

1.f Emission Limitations:

0.5 lb/hr particulates (combined emissions from stacks P108-S01 and P114-S02)
2.2 tpy particulates

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing an emission test in accordance with the procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A.

The tpy emission limitation was developed by multiplying the short-term allowable PE limitation (0.5 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI 16-01955]

V. Testing Requirements (continued)

1.g Emission Limitation:

9.0 lbs/hr TCE/OC (combined stack and fugitive emissions)

Applicable Compliance Method:

Combined stack and fugitive emissions shall be calculated daily in accordance with the following methodology:

Input Parameters:

D = density of TCE makeup pumped into day tank (lbs/gal) [handbook value]

M = virgin TCE makeup pumped into day tank (gallons) [tallied each time material is transferred]

W = waste TCE removed from process (lbs) [recorded on waste manifest for each drum of material removed]

Rads = TCE emission rate from carbon adsorber (lbs/hr) [the TCE emission rate measured during the most recent emission test]

H = time of Teslin production operation on the line that is in operation for the longer period of time (i.e., record the hours of operation for each line, and H = the higher of the two lines) (hrs) [production records]

R = TCE recovered from the carbon adsorber, in lbs/day

i. Calculate daily point source emissions from the combined operation of Line 2 and Line 3: (lbs)

$E_{ads} = H \times Rads$

ii. Perform daily calculation of TCE added to system (total emissions): (lbs)

$E_{tot} = MD - W$

iii. Calculate total air emissions as a rolling, 30-day summation: (lbs)

$E_{tot30} = \text{Summation}_{30}(E_{tot})$ (for day plus previous 29 days)

iv. Calculate point source emissions as a rolling, 30-day summation: (lbs)

$E_{ads30} = \text{Summation}_{30} E_{ads}$ (for day plus previous 29 days)

v. Calculate fugitive emissions as a rolling, 30-day summation: (lbs)

$E_{fug30} = E_{tot30} - E_{ads30}$

V. Testing Requirements (continued)

vi. Calculate hourly average fugitive emissions: (lbs/hr)

$$E_{\text{fug hourly}} = E_{\text{fug30}} / (\text{summation}_{30} H)$$

vii. Calculate hourly average fugitive emissions from Line 3: (lbs/hr)

$$E_{\text{fug hourly L3}} = E_{\text{fug hourly}} / 2$$

If either Line 2 or Line 3 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

viii. Calculate hourly average combined stack and fugitive emissions for Line 3: (lbs/hr)

$$\text{Avg Emissions} = E_{\text{fug hourly L3}} + \text{Rads}$$

[Authority for term: PTI 16-01955]

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

a. The emission testing shall be conducted within 3 months after the effective date of this permit.

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

c. The following test method(s) shall be employed to demonstrate compliance: for organic compounds, Methods 1 through 4 and 18 of 40 CFR Part 60, Appendix A and Part III, section (A)(V)(2)(e); and for verification of permanent total enclosure for each primary process enclosure, Method 204 of 40 CFR Part 51, Appendix M.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

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

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

V. Testing Requirements (continued)

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

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

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD 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 Akron RAQMD.

[Authority for term: PTI 16-01955]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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