



State of Ohio Environmental Protection Agency

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P.O. Box 1049  
Columbus, OH 43216-1049

01/31/01

**CERTIFIED MAIL**

**RE: Draft Title V Chapter 3745-77 permit**

14-31-15-0801  
Formica Corporation - Evendale Operations  
Michael J. End  
10155 Reading Rd.  
Cincinnati, OH 45241-4805

Dear Michael J. End:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Hamilton County Dept. of Environmental Services within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

**If you have any questions or comments concerning this draft Title V permit, please contact Hamilton County Dept. of Environmental Services.**

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA  
Jim Orlemann, DAPC Engineering  
Michael Ahern, DAPC PMU  
Hamilton County Dept. of Environmental Services  
Indiana  
Kentucky



## Ohio EPA

State of Ohio Environmental Protection Agency

### DRAFT TITLE V PERMIT

Issue Date: 01/31/01

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance to:

Formica Corporation - Evendale Operations  
10155 Reading Rd.  
Cincinnati, OH 45241-4805

of a Title V permit for Facility ID: 14-31-15-0801

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

K001 (Coater 104)

Paper is coated with resin and oven cured

K002 (Coater 103)

Paper is coated with resin and oven cured

K003 (Treater 100)

Paper is coated with resin and oven cured

K004 (Treater 101)

Paper is coated with resin and oven cured

K005 (Treater 102)

Paper is coated with resin and oven cured

K006 (Coater 106)

Paper is coated with resin and oven cured

K011 (Clawson 48-inch Coater)

Treat and coat paper for R & D and production uses.

K013 (Treater 99)

Paper is coated with resin and oven cured

K014 (Coater 109)

Paper is coated with resin and oven cured

Z018 (#1 Trimming Operation)

Product edges are trimmed. Formerly OEPA Source P023.

Z019 (#2 Trimming Operation)

Product edges are trimmed. Formerly OEPA Source P024.

Z020 (#3 Trimming Operation)

Product edges are trimmed.

Z021 (#4 Trimming Operation)

Product edges are trimmed. Formerly OEPA Source P001.

Z022 (#5 Trimming Operation)

Product edges are trimmed. Formerly OEPA Source P025.

Z030 (#1 Sanding Operation)

Sheets of product are sanded. Formerly OEPA Source P023.

Z031 (#2 Sanding Operation)

Sheets of product are sanded. Formerly OEPA Source P024.

Z032 (#3 Sanding Operation)

Sheets of product are sanded.

Z033 (#4 Sanding Operation)

Sheets of product are sanded. Formerly OEPA Source P001.

Z034 (#5 Sanding Operation)

Sheets of product are sanded. Formerly OEPA Source P025.

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 3745-77-04(A) 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:

Hamilton County Dept. of Environmental Services  
250 William Howard Taft Rd  
Cincinnati, OH 45219-2660  
(513) 946-7777

OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Section

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, 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.
- 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
  - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-

annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- 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 are true, accurate, and complete.

## **2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

## **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.

## **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.

## **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. 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.

## **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.

## **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.

## **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.

## **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 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.

## **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.

## **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 preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency 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 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.

### **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.

#### **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).

#### **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.

#### **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, except that no such notice shall be required for changes that qualify as insignificant emission 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; and

- 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.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

## **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.

## **18. Insignificant Activity**

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

## **B. State Only Enforceable Section**

### **1. 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.

### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

### **3. Records Retention Requirements**

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

### **4. Inspections and Information Requests**

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. 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 deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## Part II - Specific Facility Terms and Conditions

### A. State and Federally Enforceable Section

1. 40 CFR Part 68 is an applicable requirement for this facility. The permittee shall comply with the Risk Management Plan submitted to the Hamilton County Department of Environmental Services.

### B. State Only Enforceable Section

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

K009 18-inch R & D Treater;  
K012 Chem Top Paper Coater;  
P008 Scrap Shredding and Conveying;  
P031 #2 Porter Saw;  
P034 #2 & #3 Stainless Steel Plate Buffer;  
P035 #10 Stainless Steel Plate Buffer;  
P042 #28 Press Plate Cleaning Line;  
P050 Kettle #6;  
P051 Surrell Products Pilot Plant;  
P052 SCMI #1;  
P053 SCMI #2;  
P054 #24/26 Press Plate Cleaning Line;  
P055 #20 Press Plate Cleaning Line;  
T001 V-5 Storage Tank - 6,000 gallons;  
Z000 Collating Area Comforter Heater;  
Z001 #1 Submarine Heater - 6.25 MMBtu/hr natural gas-fired;  
Z002 #2 Submarine Heater - 6.25 MMBtu/hr natural gas-fired;  
Z003 #3 Submarine Heater - 6.25 MMBtu/hr natural gas-fired;  
Z004 #4 Submarine Heater - 6.25 MMBtu/hr natural gas-fired;  
Z010 Emergency Generator #1;  
Z011 Emergency Generator #2;  
Z012 V-2 Storage Tank - 12,000 gallons;  
Z013 V-3 Storage Tank - 12,000 gallons;  
Z014 V-4 Storage Tank - 12,000 gallons;  
Z016 Methanol Tank - 12,000 gallons;  
Z017 #2 Oil Storage Tanks - total gallons 110,000;  
Z023 #22 Press Plate Cleaning Line;  
Z025 TK 501 Storage Tank - 2,000 gallons;  
Z026 Buffing Press Plates #1;  
Z027 Buffing Press Plates #2;  
Z028 V-6 Storage Tank - 50,000 gallons;  
Z035 K2 Coating & Press;  
Z036 V-7 Storage Tank - 50,000 gallons;  
Z037 V-1 Storage Tank - 12,000 gallons;  
Z038 Warehouse Saw;  
Z039 #2 Divide Saw;  
Z040 Melamine Tank 1 - 4,000 gallons;  
Z041 Melamine Tank 2 - 4,000 gallons;  
Z042 Melamine Tank 3 - 4,000 gallons;  
Z043 Melamine Tank 4 - 4,000 gallons;  
Z044 Melamine Tank 5 - 4,000 gallons;  
Z045 Blend Tank 1 - 1,500 gallons;  
Z046 Blend Tank 2 - 1,500 gallons;  
Z047 Blend Tank 3 - 1,500 gallons;  
Z048 Blend Tank 4 - 1,500 gallons;  
Z049 Blend Tank 5 - 4,000 gallons;  
Z050 Blend Tank 6 - 1,500 gallons;

**B. State Only Enforceable Section (continued)**

- Z051 Column Filters;
- Z052 Dissolvers;
- Z053 Weigh Tank #1 - 880 gallons;
- Z054 Weigh Tank #2 - 880 gallons;
- Z055 C1 Storage Tank - 3,670 gallons;
- Z056 C2 Storage Tank - 3,670 gallons;
- Z058 Indy Saw #1;
- Z059 Indy Saw #2;
- Z060 #3/#4 Coal Bunker;
- Z061 #5 Coal Bunker;
- Z063 #12 Stainless Steel Plate Buffer;
- Z064 Vinyl Filmer;
- Z065 Piscataway Saw;
- Z066 Auto Inspection Machine;
- Z067 Skilsaw #1;
- Z068 Skilsaw #2;
- Z069 Skilsaw #3;
- Z070 Vacublast #1;
- Z071 Vacublast #2;
- Z072 Solvent Cleaning Stations;
- Z075 Coal Handling;
- Z076 Sawdust Handling & Storage;
- Z078 Press #20;
- Z079 Press #22;
- Z080 Press #24;
- Z081 Press #26; and
- Z082 Press #28.

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.

## Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Coater 104 (K001)  
**Activity Description:** Paper is coated with resin and oven cured

### 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>
phenolic resin paper coating line (Coater #104)	OAC rule 3745-21-09(F)	The VOC content as applied, of each coating employed shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

#### 2. Additional Terms and Conditions

None

#### II. Operational Restrictions

None

#### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

#### IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

**V. Testing Requirements**

1. OAC rule 3745-21-10(B). USEPA method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**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:** Coater 103 (K002)  
**Activity Description:** Paper is coated with resin and oven cured

**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>
phenolic resin paper coating line (Coater #103)	OAC rule 3745-21-09(F)	The VOC content as applied, of each coating employed shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

**IV. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

**V. Testing Requirements**

1. OAC rule 3745-21-10(B). USEPA method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**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:** Treater 100 (K003)  
**Activity Description:** Paper is coated with resin and oven cured

### 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>
paper treater (Treater #100)	OAC rule 3745-21-09(PP)(1)	The VOC content of any coating employed in this emissions unit shall not exceed .9 pound of VOC per gallon of coating, excluding water and exempt solvents.

#### 2. Additional Terms and Conditions

None

#### II. Operational Restrictions

None

#### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

#### IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

**V. Testing Requirements**

1. OAC rule 3745-21-10(B). USEPA method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**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:** Treater 101 (K004)  
**Activity Description:** Paper is coated with resin and oven cured

**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>
paper treater (Treater #101)	OAC rule 3745-21-09(PP)(1)	The VOC content of any coating employed in this emissions unit shall not exceed .9 pound of VOC per gallon of coating, excluding water and exempt solvents.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

**IV. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

## **V. Testing Requirements**

1. OAC rule 3745-21-10(B). USEPA method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

## **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:** Treater 102 (K005)  
**Activity Description:** Paper is coated with resin and oven cured

**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>
paper treater (Treater #101)	OAC rule 3745-21-09(PP)(1)	The VOC content of any coating employed in this emissions unit shall not exceed .9 pound of VOC per gallon of coating, excluding water and exempt solvents.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

**IV. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

**V. Testing Requirements**

1. OAC rule 3745-21-10(B). USEPA method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

**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:** Coater 106 (K006)  
**Activity Description:** Paper is coated with resin and oven cured

**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>
phenolic resin paper coating line (Coater #106)	OAC rule 3745-31-05(A)(3) (PTI 14-4511)	115.8 tons VOC/yr  The total combined VOC emissions from emissions units K006 and K014 shall not exceed 115.8 tons/yr, based on a rolling, 12-month summation.
	OAC rule 3745-21-09(F)	The VOC content as applied, of each coating employed shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for this emissions unit on a monthly basis:
  - a. The name and identification number of each coating and cleanup material employed.
  - b. The VOC content of each coating, excluding water and exempt solvents, as applied.
  - c. The VOC content of each coating and cleanup material, as applied.
  - d. The number of gallons of each coating and cleanup material employed.
  - e. The total VOC emissions from all coatings and cleanup materials employed (the summation of line c X line d), in pounds or tons.
  - f. The total amount of natural gas combusted in the curing oven and the total VOC emissions from the combustion of natural gas in the curing oven (the total amount of natural gas burned per month in cubic feet X 1000 Btu/cubic foot of natural gas X 0.0058 lb VOC/MMBtu\*).  
  
\*emission factor taken from AP 42, Fifth Edition, 1/95, Section 1.4 Natural Gas Combustion
  - g. The total VOC emissions from all coatings, cleanup materials, and natural gas employed (the summation of line e and line f ), in tons.
2. The permittee shall also collect and record the following information on a monthly basis:
  - a. The combined total VOC emissions from all coatings, cleanup materials, and natural gas employed in emissions units K006 and K014 (the summation of the values from A.III.1.g and A.III.4.g for emissions units K006 and K014, respectively), in tons.
  - b. The total combined rolling, 12-month summation of the VOC emissions for emissions units K006 and K014 (the current monthly total VOC emissions added to the total VOC emissions for the previous 11 months), in tons.

### IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports for any monthly record documenting an exceedance of the total combined rolling, 12-month emission limitation for VOC from emissions units K006 and K014.
3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.
4. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit and from emissions units K006 and K014 combined. These reports shall be submitted by January 31 of each year and cover the previous years operation.

### V. Testing Requirements

1. OAC rule 3745-21-10(B). USEPA method 24 shall be used to determine the VOC content for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. Formulation data shall be used to determine the VOC contents for the cleanup materials.

**V. Testing Requirements (continued)**

2. Compliance with the VOC emission limitation of 115.8 TPY for emissions unit K006 shall be demonstrated by the information collected and recorded in A.III.1.

Compliance with the total combined rolling, 12-month VOC emission limitation of 115.8 TPY for emissions units K006 and K014 shall be demonstrated by the information collected and recorded in A.III.2.

**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:** Clawson 48-inch Coater (K011)

**Activity Description:** Treat and coat paper for R & D and production uses.

**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>
paper coating line (Clawson 48-inch Coater)	OAC rule 3745-21-09(F)	The VOC content as applied, of each coating employed shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the line:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

**IV. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

Facility Name: **Formica Corporation - Evendale Operations**

Facility ID: **14-31-15-0801**

Emissions Unit: **Clawson 48-inch Coater (K011)**

## **V. Testing Requirements**

1. OAC rule 3745-21-10(B). USEPA method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

## **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:** Treater 99 (K013)  
**Activity Description:** Paper is coated with resin and oven cured

**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>
melamine resin paper treater line (Treater 99)	OAC rule 3745-31-05(A)(3) (PTI 14-4281)	234 lbs VOC/hr from coatings  4.73 lbs formaldehyde/hr  38.77 tons VOC/yr, based on a rolling, 12-month summation
	OAC rule 3745-21-09(PP)(1)	See Terms A.I.2.a and A.I.2.b below.  The VOC content of any coating employed in this emissions unit shall not exceed .9 pound of VOC per gallon of coating, excluding water and exempt solvents.

**2. Additional Terms and Conditions**

- 2.a The curing oven emissions shall not exceed the following:  
  
0.0006 lb SO<sub>2</sub>/MMBtu, 0.02 TPY SO<sub>2</sub>  
0.021 lb CO/MMBtu, 0.6 TPY CO  
0.10 lb NO<sub>x</sub>/MMBtu, 2.8 TPY NO<sub>x</sub>  
0.0058 lb VOC/MMBtu  
0.012 lb PM/PM<sub>10</sub>/MMBtu, 0.33 TPY PM/PM<sub>10</sub>
- 2.b The lbs VOC/hr emission limitation, lbs formaldehyde/hr emission limitation, and the lb/MMBtu and non-rolling TPY emission limitations for natural gas combustion established in PTI 14-4281 were based on the emission unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.

**II. Operational Restrictions**

**None**

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each coating and cleanup material employed in this emissions unit on a monthly basis:
  - a. The name and identification number of each coating and cleanup material employed.
  - b. The VOC content of each coating, excluding water and exempt solvents, as applied.
  - c. The VOC content of each coating and cleanup material, as applied.
  - d. The number of gallons of each coating and cleanup materials employed.
  - e. The total VOC emissions from all coatings and cleanup materials employed (the summation of line c X line d).
  - f. The total amount of natural gas combusted in the curing oven and the total VOC emissions from the combustion of natural gas in the curing oven (the total amount of natural gas burned per month in cubic feet X 1000 Btu/cubic foot of natural gas X 0.0058 lb VOC/MMBtu\*).

\*emission factor taken from AP 42, Fifth Edition, 1/95, Section 1.4 Natural Gas Combustion

  - g. The total VOC emissions from all coatings, cleanup materials, and natural gas employed (the summation of line e and line f ), in tons.
  - h. The rolling, 12-month summation of the VOC emissions (the current monthly total VOC emissions from line g added to the total VOC emissions for the previous 11 months), in tons.

### IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports for any monthly record documenting an exceedance of the rolling, 12-month emission limitation of 38.77 TPY of VOC.
3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.
4. The permittee shall submit annual reports that specify the total VOC, SO<sub>2</sub>, CO, NO<sub>x</sub>, and PM/PM<sub>10</sub> emissions from this emissions unit. These annual reports shall be submitted by January 31 of each year and cover the previous years operation.

### V. Testing Requirements

1. OAC rule 3745-21-10(B). USEPA method 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. Formulation data shall be used to determine the VOC contents for the cleanup materials.
2. Compliance with the VOC emission limitation of 38.77 TPY based on a rolling, 12-month summation shall be demonstrated by the information collected and recorded in A.III.1.

**V. Testing Requirements (continued)**

3. The lbs formaldehyde/hr emission limitation, and the lb/MMBtu and non-rolling TPY emission limitations were established using worst case operating scenarios and the appropriate emission factors from AP 42, Fifth Edition, 1/95, Section 1.4, Natural Gas Combustion. The lbs VOC/hr emission limitation for the coatings was established using a worst case operating scenario and the maximum VOC coating content. Compliance with the lbs formaldehyde/hr emission limitation, and the lb/MMBtu and non-rolling TPY emission limitations can be demonstrated using the records required pursuant to A.III.1 and the appropriate emission factors from AP 42, Fifth Edition, Section 1.4, Natural Gas Combustion. Compliance with the lbs VOC/hr emission limitation for the coatings can be demonstrated using the worst case operating scenario and the VOC coating content records required pursuant to A.III.1.

**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>
melamine resin paper treater line (Treater 99)		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (K013) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Formaldehyde  
 TLV (ug/m3): 370  
 Maximum Hourly Emission Rate (lbs/hr): 4.73  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 8.7  
 MAGLC (ug/m3): 8.8

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

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Coater 109 (K014)  
**Activity Description:** Paper is coated with resin and oven cured

#### 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>
paper coating line controlled with a total enclosure and a thermal incinerator (Coater #109)	OAC rule 3745-31-05(A)(3) (PTI 14-4511)	11.0 lbs VOC/hr from coatings  2.62 lbs formaldehyde/hr  39.9 tons VOC/yr  The total combined VOC emissions from emissions units K006 and K014 shall not exceed 115.8 tons/yr, based on a rolling, 12-month summation.
	OAC rule 3745-21-09(F)	See Terms A.I.2.a through A.I.2.d below.  The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- This emissions unit shall be equipped with a permanent total enclosure system with 100 percent capture efficiency, in accordance with Appendix M-Part 51-Method 204 and a thermal incinerator with a minimum 99 percent VOC (Volatile Organic Compound) and Organic HAP (Hazardous Air Pollutants) control efficiency thus giving an overall control efficiency of 99 percent.
- The curing oven emissions shall not exceed the following:  
  
0.14 lb NOx/MMBtu, 9.2 TPY NOx;  
0.0006 lb SO2/MMBtu, 0.04 TPY SO2;  
0.035 lb CO/MMBtu, 2.3 TPY CO;  
0.0058 lb VOC/MMBtu; and  
0.0137 lb PM/PM10/MMBtu, 0.9 TPY PM/PM10.

## 2. Additional Terms and Conditions (continued)

**2.c** The incinerator emissions shall not exceed the following:

0.10 lb NO<sub>x</sub>/MMBtu, 0.75 TPY NO<sub>x</sub>;  
0.0006 lb SO<sub>2</sub>/MMBtu, 0.004 TPY SO<sub>2</sub>;  
0.021 lb CO/MMBtu, 0.16 TPY CO;  
0.0058 lb VOC/MMBtu; and  
0.012 lb PM/PM<sub>10</sub>/MMBtu, 0.09 TPY PM/PM<sub>10</sub>.

**2.d** The lbs VOC/hr emission limitation, lbs formaldehyde/hr emission limitation, and the lb/MMBtu and non-rolling TPY emission limitations for natural gas combustion established in PTI 14-4511 were based on the emission unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.

## II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance
2. The permanent total enclosure 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.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall operate and maintain monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee..
3. The permittee shall collect and record the following information for each day:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. The difference in pressure between the permanent total enclosure and the surrounding area(s).
  - c. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

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

4. The permittee shall collect and record the following information for this emissions unit on a monthly basis:
  - a. The name and identification number of each coating and cleanup material employed.
  - b. The VOC content of each coating and cleanup material, as applied, in lbs/gallon.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The total uncontrolled VOC emissions from all coatings and cleanup materials employed (the summation of line b X line c), in tons.
  - e. The total amount of natural gas combusted in the curing oven and the total VOC emissions from the combustion of natural gas in the curing oven (the total amount of natural gas burned per month in cubic feet X 1000 Btu/cubic foot of natural gas X 0.0058 lb VOC/MMBtu\*).

\*emission factor taken from AP 42, Fifth Edition, 1/95, Section 1.4 Natural Gas Combustion

- f. The total controlled VOC emissions from all coatings and cleanup materials employed (the value from line d X the overall control efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance).
  - g. The total VOC emissions from all coatings, cleanup materials, and natural gas employed (the summation of line e and line f ), in tons.
5. The permittee shall also collect and record the following information on a monthly basis:
  - a. The combined total VOC emissions from all coatings, cleanup materials, and natural gas employed in emissions units K006 and K014 (the summation of the values from A.III.1.g and A.III.4.g for emissions units K006 and K014, respectively), in tons.
  - b. The total combined rolling, 12-month summation of the VOC emissions for emissions units K006 and K014 (the current monthly total VOC emissions added to the total VOC emissions for the previous 11 months), in tons.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Any monthly record documenting an exceedance of the total combined rolling, 12-month emission limitation for VOC from emissions units K006 and K014.
  - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified in A.II.1.
  - c. All periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in A.II.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.
3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit and from emissions units K006 and K014. These reports shall be submitted by January 31 of each year and cover the previous years operation.

## V. Testing Requirements

1. OAC rule 3745-21-10(B). USEPA method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. Formulation data shall be used to determine the VOC contents for cleanup materials.
2. Compliance with the VOC emission limitation of 39.9 TPY for emissions unit K014 shall be demonstrated by the information collected and recorded in A.III.4.

Compliance with the total combined rolling, 12-month VOC emission limitation of 115.8 TPY for emissions units K006 and K014 shall be demonstrated by the information collected and recorded in A.III.5.

3. 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 2 1/2 years after issuance of this permit and within 6 months of its expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the lbs VOC/hr emission limitation and the overall control efficiency requirement.
  - c. The following test method(s) shall be employed to demonstrate compliance with the lbs VOC/hr emission limitation and the overall control efficiency requirement:

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. 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.

The mass rate of emissions shall be determined using Methods 1-4 and 25 of 40 CFR Part 60, Appendix A

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

**V. Testing Requirements (continued)**

4. The lbs formaldehyde/hr emission limitation, and the lb/MMBtu and non-rolling TPY emission limitations were established using worst case operating scenarios and the appropriate emission factors from AP 42, Fifth Edition, 1/95, Section 1.4, Natural Gas Combustion. The lbs VOC/hr emission limitation for the coatings was established using a worst case operating scenario and the maximum VOC coating content. Compliance with the lbs formaldehyde/hr emission limitation, and the lb/MMBtu and non-rolling TPY emission limitations can be demonstrated using the records required pursuant to A.III.4 and the appropriate emission factors from AP 42, Fifth Edition, Section 1.4, Natural Gas Combustion. Compliance with the lbs VOC/hr emission limitation for the coatings can be demonstrated using the worst case operating scenario and the VOC coating content records required pursuant to A.III.4.

**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>
paper coating line controlled with a total enclosure and a thermal incinerator (Coater #109)		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (K014) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Formaldehyde  
 TLV (ug/m3): 370  
 Maximum Hourly Emission Rate (lbs/hr): 2.62  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 8.79  
 MAGLC (ug/m3): 8.8

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

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** #1 Trimming Operation (Z018)

**Activity Description:** Product edges are trimmed. Formerly OEPA Source P023.

#### 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>
trim line w/cyclone (#1 trimming operation formerly P023)	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule. 9.51 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-11(B)	

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The particulate emissions from this emissions unit shall be vented to a cyclone.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. Whether the emissions are representative of normal operations.
  - b. If the emissions are not representative of normal operations, the cause of the emissions.
  - c. The total duration of any visible emission incident.
  - d. Any corrective actions taken to minimize or eliminate the visible emissions.
2. The permittee shall perform quarterly inspections on the cyclone controlling this emissions unit. At a minimum these inspections shall include the following:
  - a. The time and date of the inspection.
  - b. The results of a visual inspection of the cyclone to ensure it is free of blockages.
  - c. Any corrective actions taken to resolve any problems with the cyclone.

#### **IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### **V. Testing Requirements**

1. If required, compliance with the visible emission limitations specified in OAC rule 3745-17-07(A) shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
2. Compliance with the particulate emission limitation of 9.51 lbs PE/hr may be demonstrated using the following equation:

$$276.3 \text{ lbs PE/hr} * X (1-0.99)^* = 2.76 \text{ lbs PE/hr}$$

\* Based on material balance and emission information submitted by company with PTO application dated 3/4/83.

Should stack testing be required to demonstrate compliance with the lbs PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(10) shall be used.

#### **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:** #2 Trimming Operation (Z019)

**Activity Description:** Product edges are trimmed. Formerly OEPA Source P024.

#### 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>
trim line w/cyclone (#2 trimming operation formerly P024)	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule. 9.51 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-11(B)	

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

1. The particulate emissions from this emissions unit shall be vented to a cyclone.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. Whether the emissions are representative of normal operations.
  - b. If the emissions are not representative of normal operations, the cause of the emissions.
  - c. The total duration of any visible emission incident.
  - d. Any corrective actions taken to minimize or eliminate the visible emissions.
2. The permittee shall perform quarterly inspections on the cyclone controlling this emissions unit. At a minimum these inspections shall include the following:
  - a. The time and date of the inspection.
  - b. The results of a visual inspection of the cyclone to ensure it is free of blockages.
  - c. Any corrective actions taken to resolve any problems with the cyclone.

#### **IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### **V. Testing Requirements**

1. If required, compliance with the visible emission limitations specified in OAC rule 3745-17-07(A) shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
2. Compliance with the particulate emission limitation of 9.51 lbs PE/hr may be demonstrated using the following equation:

$$276.3 \text{ lbs PE/hr} * X (1-0.99)^* = 2.76 \text{ lbs PE/hr}$$

\* Based on material balance and emission information submitted by company with PTO application dated 3/4/83.

Should stack testing be required to demonstrate compliance with the lbs PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(10) shall be used.

#### **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:** #3 Trimming Operation (Z020)  
**Activity Description:** Product edges are trimmed.

### 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>
trim line w/baghouse (#3 trimming operation formerly P025)	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	9.51 lbs particulate emissions (PE)/hr

#### 2. Additional Terms and Conditions

None

#### II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 3-6 inches of water while the emissions unit is in operation.

#### III. Monitoring and/or Record Keeping Requirements

- 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). The permittee shall record the pressure drop across the baghouse on a daily basis.

#### IV. Reporting Requirements

- The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
- The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

#### V. Testing Requirements

- If required, compliance with the visible emission limitations specified in OAC rule 3745-17-07(A) shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

**V. Testing Requirements (continued)**

2. Compliance with the particulate emission limitation of 9.51 lbs PE/hr may be demonstrated using the following equation:

$$276.3 \text{ lbs PE/hr} * X (1-0.99)^* = 2.76 \text{ lbs PE/hr}$$

\* Based on material balance and emission information submitted by company with PTO application dated 3/4/83.

Should stack testing be required to demonstrate compliance with the lbs PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A and the precedures specified in OAC rule 3745-17-03(B)(10) shall be used.

**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:** #4 Trimming Operation (Z021)

**Activity Description:** Product edges are trimmed. Formerly OEPA Source P001.

### 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>
trim line w/cyclone (#4 trimming operation formerly P001)	OAC rule 3745-31-05(A)(3) (PTI 14-2783)	See Term A.I.2.a below.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-11	The lbs PE/hr emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

#### 2. Additional Terms and Conditions

- 2.a The total combined particulate emissions from emissions units Z021 and Z033 shall not exceed the following:
  - 1.2 lbs PE/hr and 0.9 lb PM10/hr
  - 5.27 TPY PE and 3.94 TPY PM10

(Z021 is the trimmer and Z033 is the sander and they are operationally connected. They each have their individual control device but a combined emission limitation.)
- 2.b The PE and PM10 emission limitations established in PTI 14-2783 were based on the emission unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.

#### II. Operational Restrictions

1. The particulate emissions from this emissions unit shall be vented to a cyclone.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. Whether the emissions are representative of normal operations.
  - b. If the emissions are not representative of normal operations, the cause of the emissions.
  - c. The total duration of any visible emission incident.
  - d. Any corrective actions taken to minimize or eliminate the visible emissions.
2. The permittee shall perform quarterly inspections on the cyclone controlling this emissions unit. At a minimum these inspections shall include the following:
  - a. The time and date of the inspection.
  - b. The results of a visual inspection of the cyclone to ensure it is free of blockages.
  - c. Any corrective actions taken to resolve any problems with the cyclone.

### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit annual reports that specify the total PE and PM10 emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. If required, compliance with the visible emission limitations specified in OAC rule 3745-17-07(A) shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
2. Compliance with the particulate emission limitation of 1.2 lbs PE/hr may be demonstrated using the following equation:

$$\begin{aligned} \text{trimmer} & 276.3 \text{ lbs PE/hr}^* \times (1 - 0.999)^* = .3 \text{ lb PE/hr} \\ \text{sander} & 450.0 \text{ lbs PE/hr}^* \times (1 - 0.998)^* = .9 \text{ lb PE/hr} \\ \text{TOTAL} & = 1.2 \text{ lbs PE/hr} \end{aligned}$$

$$\begin{aligned} \text{trimmer} & 0.3 \text{ lb PE/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 1.32 \text{ TPY PE} \\ \text{sander} & 0.9 \text{ lb PE/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.94 \text{ TPY PE} \\ \text{TOTAL} & = 5.26 \text{ TPY PE} \end{aligned}$$

\* Based on material balance and emission information submitted with PTI application 14-2783 dated on 8/24/92.

For compliance with the PM10 emission limitations, assume all the trimmer emissions are greater than 10 um and all of the sander emissions are less than 10 um.

Should stack testing be required to demonstrate compliance with the lbs PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A shall be used.

Facility Name: **Formica Corporation - Evendale Operations**  
Facility ID: **14-31-15-0801**  
Emissions Unit: **#4 Trimming Operation (Z021)**

**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:** #5 Trimming Operation (Z022)

**Activity Description:** Product edges are trimmed. Formerly OEPA Source P025.

#### 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>
trim line w/cyclones (#5 trimming operation formerly P056)	OAC rule 3745-31-05(A)(3) (PTI 14-3784)	See Term A.I.2.a below.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-11	The lbs PE/hr emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The total combined particulate emissions from emissions units Z022 and Z034 shall not exceed the following:

0.083 lb PE/hr and 0.027 lb PM10/hr  
 0.37 TPY PE and 0.12 TPY PM10

(Z022 is the trimmer and Z034 is the sander and they are operationally connected. They each have their individual control device(s) but a combined emission limitation.)

- 2.b The PE and PM10 emission limitations established in PTI 14-3784 were based on the emission unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.

##### II. Operational Restrictions

1. The particulate emissions from this emissions unit shall be vented to the cyclones.

### **III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. Whether the emissions are representative of normal operations.
  - b. If the emissions are not representative of normal operations, the cause of the emissions.
  - c. The total duration of any visible emission incident.
  - d. Any corrective actions taken to minimize or eliminate the visible emissions.
2. The permittee shall perform quarterly inspections on the cyclones controlling this emissions unit. At a minimum these inspections shall include the following:
  - a. The time and date of the inspection.
  - b. The results of a visual inspection of each cyclone to ensure it is free of blockages.
  - c. Any corrective actions taken to resolve any problems with the cyclones.

### **IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Hamilton County Department of Environmental Services by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit annual reports that specify the total PE and PM10 emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### **V. Testing Requirements**

1. If required, compliance with the visible emission limitations specified in OAC rule 3745-17-07(A) shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

## V. Testing Requirements (continued)

2. Compliance with the PE limitations may be demonstrated using the following equation:

$$\begin{aligned} \text{trimmer} & 540 \text{ lbs PE/hr}^* \times (1 - 0.98)^* \times (1 - 0.996)^* = .04 \text{ lb PE/hr} \\ \text{sander} & 540 \text{ lbs PE/hr}^* \times (1 - 0.98)^* \times (1 - 0.996)^* = .04 \text{ lb PE/hr} \\ \text{TOTAL} & = 0.8 \text{ lb PE/hr} \end{aligned}$$

$$\begin{aligned} \text{trimmer} & .04 \text{ lb PE/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs} = .18 \text{ TPY PE} \\ \text{sander} & .04 \text{ lb PE/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs} = .18 \text{ TPY PE} \\ \text{TOTAL} & = .36 \text{ TPY PE} \end{aligned}$$

\* Based on material balance and emission information submitted with PTI application 14-3784 dated on 1/20/95.

Compliance with the PM10 emission limitations may be demonstrated using the following equation:

$$\begin{aligned} .08 \text{ lb PE/hr} \times .321^* & = .027 \text{ lb PM10/hr} \\ .36 \text{ TPY PE} \times .321^* & = .12 \text{ TPY PM10} \end{aligned}$$

\* emission factor taken from AP-42, Fifth Edition, Appendix B.1, page B.1-48, dated 1/95

Should stack testing be required to demonstrate compliance with the lb PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A shall be used.

## 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:** #1 Sanding Operation (Z030)

**Activity Description:** Sheets of product are sanded. Formerly OEPA Source P023.

**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>
sand line w/baghouse (#1 sanding operation formerly P023)	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule. 9.01 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-11(B)	

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

- The pressure drop across the baghouse shall be maintained within the range of 3-6 inches of water while the emissions unit is in operation.

**III. Monitoring and/or Record Keeping Requirements**

- 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). The permittee shall record the pressure drop across the baghouse on a daily basis.

**IV. Reporting Requirements**

- The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
- The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

**V. Testing Requirements**

- If required, compliance with the visible emission limitations specified in OAC rule 3745-17-07(A) shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

**V. Testing Requirements (continued)**

2. Compliance with the particulate emission limitation of 9.01 lbs PE/hr may be demonstrated using the following equation:

$$450 \text{ lbs PE/hr} * X (1-0.998)^* = .9 \text{ lb PE/hr}$$

\* Based on material balance and emission information submitted by company with PTO application dated 3/4/83.

Should stack testing be required to demonstrate compliance with the lbs PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A and the precedures specified in OAC rule 3745-17-03(B)(10) shall be used.

**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:** #2 Sanding Operation (Z031)

**Activity Description:** Sheets of product are sanded. Formerly OEPA Source P024.

### 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>
sand line w/baghouse (#2 sanding operation formerly P024)	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-11(B)	9.01 lbs particulate emissions (PE)/hr

#### 2. Additional Terms and Conditions

None

#### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 3-6 inches of water while the emissions unit is in operation.

#### 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). The permittee shall record the pressure drop across the baghouse on a daily basis.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

#### V. Testing Requirements

1. If required, compliance with the visible emission limitations specified in OAC rule 3745-17-07(A) shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

**V. Testing Requirements (continued)**

2. Compliance with the particulate emission limitation of 9.01 lbs PE/hr may be demonstrated using the following equation:

$$450 \text{ lbs PE/hr} * X (1-0.998)^* = .9 \text{ lb PE/hr}$$

\* Based on material balance and emission information submitted by company with PTO application dated 3/4/83.

Should stack testing be required to demonstrate compliance with the lbs PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(10) shall be used.

**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:** #3 Sanding Operation (Z032)  
**Activity Description:** Sheets of product are sanded.

**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>
sand line w/baghouse (#3 sanding operation formerly P025)	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule. 9.01 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-11(B)	

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

- The pressure drop across the baghouse shall be maintained within the range of 3-6 inches of water while the emissions unit is in operation.

**III. Monitoring and/or Record Keeping Requirements**

- 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). The permittee shall record the pressure drop across the baghouse on a daily basis.

**IV. Reporting Requirements**

- The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
- The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

**V. Testing Requirements**

- If required, compliance with the visible emission limitations specified in OAC rule 3745-17-07(A) shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

**V. Testing Requirements (continued)**

2. Compliance with the particulate emission limitation of 9.01 lbs PE/hr may be demonstrated using the following equation:

$$450 \text{ lbs PE/hr} * X (1-0.998)^* = .9 \text{ lb PE/hr}$$

\* Based on material balance and emission information submitted by company with PTO application dated 3/4/83.

Should stack testing be required to demonstrate compliance with the lbs PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(10) shall be used.

**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:** #4 Sanding Operation (Z033)

**Activity Description:** Sheets of product are sanded. Formerly OEPA Source P001.

#### 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>
sand line w/baghouse (#4 sanding operation formerly P001)	OAC rule 3745-31-05(A)(3) (PTI 14-2783)	See Term A.I.2.a below.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-11	The lbs PE/hr emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The total combined particulate emissions from emissions units Z021 and Z033 shall not exceed the following:
  - 1.2 lbs PE/hr and 0.9 lb PM10/hr
  - 5.27 TPY PE and 3.94 TPY PM10

(Z021 is the trimmer and Z033 is the sander and they are operationally connected. They each have their own individual control device but a combined emission limitation.)
- 2.b The PE and PM10 emission limitations established in PTI 14-2783 were based on the emission unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 3-6 inches of water while the emissions unit is in operation.

### 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). The permittee shall record the pressure drop across the baghouse on daily basis.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

The permittee shall submit annual reports that specify the total PE and PM10 emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. If required, compliance with the visible emission limitations specified in OAC rule 3745-17-07(A) shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
2. Compliance with the particulate emission limitation of 1.2 lbs PE/hr may be demonstrated using the following equation:

trimmer 276.3 lbs PE/hr\* X (1 - 0.999)\* = .3 lb PE/hr  
sander 450.0 lbs PE/hr\* X (1 - 0.998)\* = .9 lb PE/hr  
TOTAL = 1.2 lbs PE/hr

trimmer 0.3 lb PE/hr X 8760 hrs/yr X 1 ton/2000 lbs = 1.32 TPY PE  
sander 0.9 lb PE/hr X 8760 hrs/yr X 1 ton/2000 lbs = 3.94 TPY PE  
TOTAL = 5.26 TPY PE

\* Based on material balance and emission information submitted with PTI application 14-2783 dated on 8/24/92.

For compliance with the PM10 emission limitations, assume all the trimmer emissions are greater than 10 um and all of the sander emissions are less than 10 um.

Should stack testing be required to demonstrate compliance with the lbs PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A shall be used.

### 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:** #5 Sanding Operation (Z034)

**Activity Description:** Sheets of product are sanded. Formerly OEPA Source P025.

#### 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>
sand line w/cyclones and baghouse (#5 sanding operation formerly P025)	OAC rule 3745-31-05(A)(3) (PTI 14-3784)	See Term A.I.2.a below.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-11	The lbs PE/hr emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The total combined particulate emissions from emissions units Z022 and Z034 shall not exceed the following:

0.083 lb PE/hr and 0.027 lb PM10/hr  
 0.37 TPY PE and 0.12 TPY PM10

(Z022 is the trimmer and Z034 is the sander and they are operationally connected. They each have their individual control device(s) but a combined emission limitation.)

- 2.b The PE and PM10 emission limitations established in PTI 14-3784 were based on the emission unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 3-6 inches of water while the emissions unit is in operation.

### 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). The permittee shall record the pressure drop across the baghouse on daily basis.
2. The permittee shall perform quarterly inspections on the cyclones controlling this emissions unit. At a minimum these inspections shall include the following:
  - a. The time and date of the inspection.
  - b. The results of a visual inspection of each cyclone to ensure it is free of blockages.
  - c. Any corrective actions taken to resolve any problems with the cyclones.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.
3. The permittee shall submit annual reports that specify the total PE and PM10 emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. If required, compliance with the visible emission limitations specified in OAC rule 3745-17-07(A) shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
2. Compliance with the PE limitations may be demonstrated using the following equation:

$$\begin{aligned} \text{trimmer} & 540 \text{ lbs PE/hr}^* \times (1 - 0.98)^* \times (1 - 0.996)^* = .04 \text{ lb PE/hr} \\ \text{sander} & 540 \text{ lbs PE/hr}^* \times (1 - 0.98)^* \times (1 - 0.996)^* = .04 \text{ lb PE/hr} \\ \text{TOTAL} & = 0.8 \text{ lb PE/hr} \end{aligned}$$

$$\begin{aligned} \text{trimmer} & .04 \text{ lb PE/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = .18 \text{ TPY PE} \\ \text{sander} & .04 \text{ lb PE/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = .18 \text{ TPY PE} \\ \text{TOTAL} & = .36 \text{ TPY PE} \end{aligned}$$

\* Based on material balance and emission information submitted with PTI application 14-3784 dated on 1/20/95.

Compliance with the PM10 emission limitations may be demonstrated using the following equation:

$$\begin{aligned} .08 \text{ lb PE/hr} \times .321^* & = .027 \text{ lb PM10/hr} \\ .36 \text{ TPY PE} \times .321^* & = .12 \text{ TPY PM10} \end{aligned}$$

\* emission factor taken from AP-42, Fifth Edition, Appendix B.1, page B.1-48, dated 1/95

Should stack testing be required to demonstrate compliance with the lb PE/hr emission limitation, Methods 1-5 from 40 CFR Part 60, Appendix A shall be used.

### 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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