



State of Ohio Environmental Protection Agency

Street Address:

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

03/31/99

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

16-77-02-0009
PPG INDUSTRIES - BARBERTON PLANT
Irene K. Raiber
PPG Industries, Inc.
4829 Fairland Road
Barberton, OH 44203-0031

Dear Irene K. Raiber:

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 Akron Air Pollution Control 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 Akron Air Pollution Control.

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
Akron Air Pollution Control
Pennsylvania
West Virginia



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 03/31/99

DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

PPG INDUSTRIES - BARBERTON PLANT
PPG Industries, Inc.
4829 Fairland Road
Barberton, OH 44203-0031

of a Title V permit for Facility ID: 16-77-02-0009

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

P098 (Chloroformate Plant)

Chloroformate Plant Dispersal Stack; Flare; South Plant

P099 (CR-39 Plant)

CR-39 Process; South Plant

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:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

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.

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. This facility is subject to the requirements of 40 CFR Part 68, Section 112(r).

B. State Only Enforceable Section

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

B013 - #1 fine chemical boiler; Cleaver Brooks; 6.28 mmBtu/hr; natural gas fired
B014 - #2 fine chemical boiler; Cleaver Brooks; 6.28 mmBtu/hr; natural gas fired
B015 - #3 fine chemical boiler; Cleaver Brooks; 6.28 mmBtu/hr; natural gas fired
B016 - #4 fine chemical boiler; Cleaver Brooks; 6.28 mmBtu/hr; natural gas fired
B017 - #5 fine chemical boiler; Cleaver Brooks; 6.28 mmBtu/hr; natural gas fired
B018 - #6 fine chemical boiler; Cleaver Brooks; 6.28 mmBtu/hr; natural gas fired
B027 - maintenance building boiler; 1.26 mmBtu/hr; natural gas fired
G001 - T-489; gasoline tank; 2500 gallons
P071 - catalyst plant; bunker/filter kettle
P113 - wastewater pretreatment system - air stripper
T012 - T-158; diethylene storage tank; T19; 10,000 gallons; PPG no. 36223
T013 - T-164; alcohol (IPOH) storage tank; T14; 10,000 gallons; PPG no. 28886
T014 - T-162; alcohol (IPOH) storage tank; T16; 10,000 gallons; PPG no. 28887
T015 - T-231; d-limonene storage tank; 10,000 gallons; PPG no. 21231
T017 - T096; No. 1 CR-39 day tank; 10,000 gallons, PPG no. 34096
T020 - T154; 2-ethylhexyl chloroformate storage tank; T13, 5,000 gallons, PPG no. 28915
T023 - T-227; azeotrope still feed tank; 10,000 gallons; PPG no. 21227
T025 - T166; n-propyl chloroformate daily storage tank; T05; 10,000 gallons; PPG no.36091
T026 - T145; allyl chloroformate daily storage tank; T01; 5,000 gallons; PPG no. 25207
T027 - T144, allyl chloroformate daily storage tank; T02; 7,600 gallons ; PPG no. 25208
T028 - T147, isopropyl chloroformate daily storage tank; T04; 5,000 gallons ; PPG no. 35672
T029 - T149, isopropyl chloroformate daily storage tank; T06; 7,600 gallons ; PPG no. 25209
T030 - T153; isopropyl chloroformate storage tank; T10; 17,000 gallons; PPG no. 19915
T031 - T161; alcohol (IPOH) storage tank; T17; 10,000 gallons; PPG no. 21147

T034 - T-146; isobutyl chloroformate daily storage tank; T03; 7,500 gallons; PPG no. 25210
T035 - T-152; diethylene glycol bis chloroformate storage tank; T07; 24,000 gallons; PPG no. 34008
T036 - T-151; diethylene glycol bis chloroformate storage tank; T08; 24,000 gallons; PPG no. 32143
T037 - T-150; diethylene glycol bis chloroformate storage tank; T09; 24,000 gallons; PPG no. 32142
T038 - T-155; n-propyl chloroformate storage tank; T11; 10,000 gallons; PPG no. 36213
T039 - T-156; isobutyl chloroformate storage tank; T12; 10,000 gallons; PPG no. 36214
T040 - T-157; diethylene glycol storage tank; T21; 20,000 gallons; PPG no. 25270
T043 - T-130; anhydrous ammonia storage tank; 5,200 gallons; PPG no. 25274
T046 - T-230; ethylene glycol storage tank; 10,000 gallons; PPG no. 21230
Z001 - T-163; 2-ethyl hexyl alcohol storage tank; T15; 10,000 gallons; PPG no. 21148
Z002 - T-160; alcohol (NPOH) storage tank; T18; 10,000 gallons; PPG no. 19610
Z003 - T-148; 2-ethyl hexyl alcohol storage tank; T20; 10,000 gallons; PPG no. 36224
Z004 - T-167; east HCl storage tank; 15,000 gallons; PPG no. 19701
Z005 - T-137; west HCl storage tank; 15,000 gallons; PPG no. 19702
Z006 - T-098; no. 2 CR-39 day tank; 10,000 gallons; PPG no. 34098
Z007 - T-100; no. 3 CR-39 day tank; 10,000 gallons; PPG no. 34100
Z008 - T-229; no. 1 NaOH day tank; 10,000 gallons; PPG no. 21229
Z009 - T-228; no. 2 NaOH day tank; 10,000 gallons; PPG no. 21228
Z010 - T-128; emergency scrubber storage tank; 4,000 gallons; PPG no. 37247
Z011 - T-118; reactor #1 dump tank; 2,000 gallons; PPG no. 25218
Z012 - T-210; OPWW NaOH (20%) tank
Z013 - T-168; cooling tower acid tank; PPG no. 38302
Z014 - T-133; toppings storage tank; 10,000 gallons; PPG no. 34133
Z015 - T-337; secondary azeotrope storage tank; 10,000 gallons; PPG no. 21226
Z016 - T-226; wastewater retention tank; 10,000 gallons; PPG no. 21225
Z017 - T-490; diesel tank; 550 gallons; maintenance department; PPG no. 37248

B. State Only Enforceable Section (continued)

- Z018 - T-004; nitrogen storage tank; 11,000 gallons; east
- Z019 - T-005; railcar nitrogen storage tank; 6,000 gallons; west
- Z020 - T-339; northeast wastewater averaging tank; 200,000 gallons; PPG no. 19916
- Z021 - T-422; southeast wastewater averaging tank; 150,000 gallons
- Z022 - old T93; tank not in service
- Z023 - old T94; tank not in service
- Z024 - T-103; hydrogen peroxide storage tank; 1,150 gallons; PPG no. 29363
- Z025 - T-481; diesel tank; 300 gallons; for fire water diesel pumps
- Z026 - T-212; optical products wastewater system - north averaging tank 250,000 gallons
- Z027 - T-213; optical products wastewater system - south averaging tank; 250,000 gallons
- Z028 - OPWW basins; optical products wastewater system - 3 wastewater basins
- Z030 - fire pump diesel engine; east; 150 hp
- Z031 - fire pump diesel engine; west; 150 hp
- Z032 - road fugitives - south
- Z033 - CR-39 building fans; fugitive emissions from operation of building fans
- Z056 - T-120; reactor #2 dump tank; 1,000 gallons; PPG no. 37643
- Z057 - MPP formulation building; DEPC stripping

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: Chloroformate Plant (P098)
Activity Description: Chloroformate Plant Dispersal Stack; Flare; South Plant

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> |
|--|---------------------------------------|--|
| chloroformate plant - phosgene converter, reactor, cascade reactor, product purification system, HCl absorption system - production of various chlorinated organic compounds | OAC rule 3745-21-07(G)(2) | 8.0 lbs/hr organic compounds (OC) 40 lbs/day OC, unless reduced by 85% |
| leak detection and repair program for organic chemical process unit equipment leaks within the phosgene converter | OAC rule 3745-21-07(G)(6) | 90% destruction of OCs |
| | OAC rule 3745-21-09(DD)(16) | In lieu of complying with the requirements specified in paragraphs (DD)(2) to (DD)(10) of OAC rule 3745-21-09(DD), the permittee shall comply with the equivalent requirement outlined in sections A.I.2.a, A.II.4 - A.II.7, A.III.4 - A.III.14, and A.IV.4. |

2. Additional Terms and Conditions

- The leak detection and repair program pertains to any type of pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, valve, flange, connector, closed vent system, and any other device or system in volatile organic compound (VOC) service within the phosgene converter process unit. The equipment covered by this permit and subject to OAC rule 3745-21-09(DD) at the time of permit issuance are listed below for general reference purposes. Changes to quantities does not necessarily require a modification to this permit:

| Equipment Description | Quantity | PPG I.D. |
|-----------------------------|----------|-------------|
| Valves in gas/vapor service | 8 | VOC #1 - #8 |
| Rupture disk | 1 | PRV-1 |
| Flanges | 29 | #1 - #29 |

2. Additional Terms and Conditions (continued)

- 2.b** The OC emissions from the following operations are collectively subject to the allowable OC emission limitations established by OAC rule 3745-21-07(G)(2):
- a. reaction;
 - b. purification;
 - c. acid production;
 - d. drum filling;
 - e. fugitive equipment leaks;
 - f. sampling; and
 - g. washouts.

II. Operational Restrictions

1. The permittee shall operate a thermal incinerator and tails scrubber whenever this emissions unit is in operation. A flare shall be used as an alternate control device.
2. A pilot flame shall be maintained at all times in the flare's pilot light burner whenever this emissions unit is in operation and employing organic compounds, and the flare is being used as the control device.
3. The average combustion temperature within the thermal incinerator, for any 3-hour block of time, 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, whenever this emissions unit is in operation and employing organic compounds and the thermal incinerator/tails scrubber are being used as the control devices.
4. Alarm sensors shall be employed in the stack to activate the ammonia deluge system if either stack monitor indicates a "high" phosgene value. Activation of the deluge system shall be reported as a "malfunction" in accordance with OAC rule 3745-15-06.
5. Stack P098-S01 shall be equipped with an emergency ammonia spray deluge for the destruction of phosgene. This system shall be capable of a destruction efficiency of at least 95 percent by weight.
6. Unless the permittee has successfully repaired the leak immediately on the first attempt, the permittee shall not employ the phosgene process unit until the leaking equipment is repaired and all leak tests are negative.
7. The rupture disk (PRV-1) shall be capable of capturing and transporting any leakage through the pressure relief device to stack P098-S01.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain a device to continuously monitor the presence of the pilot flame when the emissions unit is in operation and employing organic compounds, and the flare is being used as the control device. The monitoring device and any recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, and any modifications deemed necessary by the permittee.

The permittee shall record the following information each day the flare is used as a control device:

- a. all periods during which both the emissions unit and control device were in operation and employing organic compounds and there was no pilot flame; and
- b. all periods during which both the emissions unit and control device were in operation and employing organic compounds and the monitoring device was out of service.

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

2. Whenever the emission unit is in operation and employing organic compounds, and the thermal incinerator/tails scrubber are used as the control devices, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when both the emissions unit and control device are in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when both the emissions unit and control devices are 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; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit and control devices were in operation.
3. Control device downtime is defined as times when the emissions unit is in operation and employing organic compounds, and neither the flare or the thermal oxidizer/tails scrubber are in operation. Monitoring equipment downtime is defined as times when the emissions unit is in operation and employing organic compounds and either:
 - a. emissions are vented to the flare, and the pilot flame monitoring is not functioning; or
 - b. emissions are vented to the thermal oxidizer, and the temperature monitoring equipment is not functioning
 4. The permittee shall monitor the ammonia deluge system and infrared analyzer to ensure that they are operating and maintained in conformance with their design, with modifications as deemed necessary by the permittee. The controls and analyzer shall be operated at all times when emissions may be vented to them.
 5. The permittee shall employ an ammonia spray leak detection technique to monitor the process equipment listed in section A.I.2.a. A leak is detected when the ammonia spray reacts with phosgene to form an ammonium chloride white vapor mist.
 6. The permittee shall leak-test all valves, flanges and the rupture disk exterior upon every process startup using the technique described in section A.III.5.
 7. When a leak is detected as described in section A.III.5, the following procedures shall be followed, except as allowed in sections A.III.8 - A.III.11:
 - i. if the leak cannot be successfully repaired immediately on the first attempt, the phosgene process unit shall be shut down;
 - ii. a record of the leak shall be entered into the VOC log book kept pursuant to section A.III.15;
 - iii. the leaking component(s) shall be repaired as soon as possible;
 - iv. the permittee shall retest the leaking component(s) after any attempts to repair; and
 - v. a leaking component(s) shall be deemed repaired when a subsequent leak test is conducted which shows a negative result.
 8. A delay of repair shall be allowed if the repair is technically infeasible without a process unit shutdown. However, the repair shall occur before the end of the next process unit shutdown.
 9. A delay of repair shall be allowed for a piece of equipment that is isolated from the process and that does not remain in VOC service (for example, isolated from the process and properly purged).

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

10. A delay of repair for a valve shall be allowed if:
 - i. the permittee demonstrates that the emission of purged material resulting from immediate repair is greater than the emission likely to result from delay of repair; and
 - ii. when repair procedures are effected, the purged material is collected and destroyed or recovered in control equipment that meets the requirements specified in paragraph (DD)(10) of this rule.
11. A delay of repair beyond a process unit shutdown shall be allowed for a valve if a valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. A delay of repair beyond the next process unit shutdown shall not be allowed for that valve unless the next process unit shutdown occurs sooner than six months after the first process unit shutdown.
12. Stack P098-S01 shall be continuously monitored for phosgene using an infrared analyzer and gas chromatograph.
13. Alarm sensors shall be employed and set at 100 ppm and 5,000 ppm to assure that leakage is not occurring from any pump, compressor, pressure relief device, sampling connection system, openended valve or line, valve, flange, connector, closed vent system, and any other device or system in VOC service within this process unit.
14. The permittee shall maintain a VOC log book which lists the identification of each piece of equipment subject to the leak detection program. The log book shall be kept in a readily accessible location and shall list the following information:
 - a. the date of each process unit startup and leak test; and
 - b. either of the following for the above dates:
 - i. "All tests negative, no leaks detected," or
 - ii. if leaking equipment identified, the following:
 - (1) an identification of the leaking equipment;
 - (2) a summary of the repairs made or attempted along with the date(s); and
 - (3) the result(s) and date(s) of the follow-up leak tests.

IV. Reporting Requirements

1. (For Flare Operating Mode)
The permittee shall submit deviation (excursion) reports that identify all periods during which both the emissions unit and control device were in operation and employing organic compounds and the pilot flame was not functioning properly. The reports shall include the date, time, and duration of each such period.
2. (For Incinerator/Tails Scrubber Mode)
The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

IV. Reporting Requirements (continued)

4. The permittee shall submit semi-annual reports to the Akron Regional Air Quality Management District which summarize the following information for this program during the preceding semi-annual periods:
 - a. the number of process unit startups and the number of leak tests;
 - b. an identification of each leak test that resulted in a positive reaction, an identification of each of the leaking components, and the date when each leaking component was repaired; and
 - c. any changes to the quantity or PPG I.D. for the equipment listed in section A.I.2.a, i.e., any pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, valve, flange, connector, closed vent system, and any other device or system in VOC service within this process unit.

The reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6 calendar months (July to December, and January to June, respectively).

V. Testing Requirements

1. Testing requirements apply to both the thermal incinerator/tails scrubber and flare operating modes.

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 approximately every 2.5 years, using the April 1 and 2, 1998 test as a baseline.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for organic compounds (see A.I.2.b).
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for OCs, Method 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The control efficiency of the thermal incinerator (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.
 - e. 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 appropriate Ohio EPA District Office or local air agency.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
 3. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
 4. 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

V. Testing Requirements (continued)

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

5.a Emission Limitation:

8.0 lbs/hr of OC
40 lbs/day of OC,
unless reduced by 85%

90% destruction of OCs

Applicable Compliance Method:

Compliance shall be determined by the emission testing requirements specified in sections A.V.1 through A.V.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> |
|--|---|---|
| chloroformate plant - phosgene converter, reactor, cascade reactor, product purification system, HCl absorption system | OAC rule 3745-31-05 (PTI 16-1215) | 2.0 lbs/hr of organic compounds (OC) 1.7 lbs/hr of hydrogen chloride 0.3 lb/hr of chlorine 1.2 lbs/hr of carbon monoxide 1.6 lbs/hr of nitrous oxides |

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

1. Testing requirements apply to the thermal incinerator/tails scrubber operating mode.

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 approximately 2.5 years after permit issuance and within 6 months prior to permit renewal.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for hydrogen chloride, chlorine, carbon monoxide, and nitrous oxides.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

for hydrogen chloride, Method 26A of 40 CFR Part 60, Appendix A;
for chlorine, Method 26A of 40 CFR Part 60, Appendix A;
for carbon monoxide, Method 25 of 40 CFR Part 60, Appendix A; and
for nitrous oxides, Method 7E of 40 CFR Part 60, Appendix A.

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

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
 3. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
 4. 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
 5. Compliance with the emission limitations in section B.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - 5.a Emission Limitation:

2.0 lbs/hr of organic compounds

Applicable Compliance Method:

Compliance shall be determined by emission testing, as specified in section A.V, in accordance with Method 25 of 40 CFR Part 60, Appendix A or approved alternative.

V. Testing Requirements (continued)

5.b Emission Limitation:

1.7 lbs/hr of hydrogen chloride

Applicable Compliance Method:

Compliance shall be determined by emission testing in accordance with Method 26A of 40 CFR Part 60, Appendix A or approved alternative.

5.c Emission Limitation:

0.3 lb/hr of chlorine

Applicable Compliance Method:

Compliance shall be determined by emission testing in accordance with Method 26A of 40 CFR Part 60, Appendix A or approved alternative.

5.d Emission Limitation:

1.2 lbs/hr of carbon monoxide

Applicable Compliance Method:

Compliance shall be determined by emission testing in accordance with Method 25 of 40 CFR Part 60, Appendix A or approved alternative.

5.e Emission Limitation:

1.6 lbs/hr of nitrous oxides

Applicable Compliance Method:

Compliance shall be determined by emission testing in accordance with Method 7E of 40 CFR Part 60, Appendix A or approved alternative.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: CR-39 Plant (P099)
Activity Description: CR-39 Process; South Plant

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> |
|---|---------------------------------------|--|
| CR-39 plant - plastic resin plant - closed vessels under a nitrogen pad vented to a packed tower scrubber | OAC rule 3745-21-07(G)(2) | 8.0 lbs/hr of organic compounds (OC) 40 lbs/day of OC |

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure at the packed tower scrubber outlet shall be continuously maintained at a vacuum greater than or equal to 7" of water at all times while the emissions unit is in operation .

The scrubber water flow rate shall be continuously maintained at a value of not less than 3.0 gallons per minute at all times while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, and any modifications deemed necessary by the permittee.

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

- the pressure at the scrubber outlet, in inches of water, on a once per shift basis;
 - the scrubber water flow rate, in gallons per minute, on a once per shift basis; and
 - the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- Control device downtime is defined as times when the emissions unit is in operation and employing organic compounds, and the scrubber is not in operation. Monitoring equipment downtime is defined as times when the emissions unit is in operation and employing organic compounds and emissions are vented to the scrubber but either the static pressure drop or the water flow rate monitoring equipment is not functioning.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the emissions unit was in operation and employing organic compounds and the following scrubber parameters were not maintained at or above the required levels:
 - a. the pressure at the scrubber outlet; and
 - b. the scrubber water flow rate.
2. The deviation reports shall be submitted in accordance with the requirements specified in General Terms and Condition A.1.c of this permit.

V. Testing Requirements

1. 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 approximately every 2.5 years, using the November 25, 1996 stack test as a baseline.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for organic compounds.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for OCs, Method 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
3. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
4. 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
5. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - 5.a Emission Limitation:

8.0 lbs/hr of OC
40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be determined by the emission testing requirements specified in sections A.V.1 through A.V.4.

Facility Name: **PPG INDUSTRIES - BARBERTON PLANT**
Facility ID: **16-77-02-0009**
Emissions Unit: **CR-39 Plant (P099)**

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> |
|---|---|--|
| CR-39 plant - plastic resin plant - closed vessels under a nitrogen pad vented to a packed tower scrubber | none | none |

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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