



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

04/28/00

CERTIFIED MAIL

**RE: Final 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 44203-3913

Dear Irene K. Raiber:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

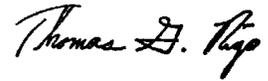
The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Akron Air Pollution Control.

Very truly yours,

A handwritten signature in black ink that reads "Thomas G. Rigo". The signature is written in a cursive style with a large, stylized initial 'T'.

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

cc: Akron Air Pollution Control
Becky Castle, DAPC PMU



Ohio EPA

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 04/28/00

Effective Date: 04/28/00

Expiration Date: 04/28/05

The duration of this permit will be five years.

This document constitutes issuance to:

PPG INDUSTRIES - BARBERTON PLANT
PPG Industries, Inc.
4829 Fairland Road
Barberton, OH 44203-3913

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 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 of federally enforceable 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.6 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 applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. (“Act”); and, pursuant to 40 CFR 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 CFR Part 68 by the date specified in 40 CFR 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 CFR Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management 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 and to the Administrator of U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted 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. Title VI Provisions

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

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

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 of state-only enforceable 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 state-only required 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. 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).

4. 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.

5. 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.

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

If no 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 Enforcable Section

1. This facility is subject to the requirements of 40 CFR Part 68, Section 112(r).
2. Ohio EPA has determined that the requirements specifically identified in the "Table of Negative Declarations - Federal Nonapplicable Requirements," are not applicable.

Table of Negative Declarations - Federal Nonapplicable Requirements

EMISSION UNIT/FACILITY ID	REQUIREMENT
South Plant	40 CFR Part 60, Subpart E
South Plant	40 CFR Part 60, Subpart K
South Plant	40 CFR Part 60, Subpart Ka
South Plant	40 CFR Part 60, Subpart Kb
South Plant	40 CFR Part 60, Subpart VV
South Plant	40 CFR Part 60, Subpart III
South Plant	40 CFR Part 60, Subpart NNN
South Plant	40 CFR Part 60, Subpart RRR
South Plant	40 CFR Part 63, Subpart F
South Plant	40 CFR Part 63, Subpart G
South Plant	40 CFR Part 63, Subpart H
South Plant	40 CFR Part 63, Subpart I

B. State Only Enforceable Section

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

P071 - catalyst plant; bunker/filter kettle
P113 - wastewater pretreatment system - air stripper
T023 - T-227; azeotrope still feed tank; 10,000 gallons; PPG no. 21227
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
T034 - T-146; isobutyl chloroformate daily storage tank; T03; 7,500 gallons; PPG no. 25210
T039 - T-156; isobutyl chloroformate storage tank; T12; 10,000 gallons; PPG no. 36214
Z030 - fire pump diesel engine; east; 150 hp
Z031 - fire pump diesel engine; west; 150 hp
Z032 - road fugitives - south

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

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 - 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%
		See A.I.2.a below.
	OAC rule 3745-21-07(G)(6)	90% destruction of OCs
	OAC rule 3745-21-09(DD)	See sections A.I.2.b, A.I.2.c, A.III.4 to A.III.16, and A.IV.4 to A.IV.6 below.

2. Additional Terms and Conditions

- 2.a 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; and
 - c. acid production

If the Environmental Review Appeals Commission (ERAC) decision that "drum filling" is not subject to OAC rule 3745-21-07(G)(2) is overturned, this emissions unit's drum filling operation shall comply with the requirements of OAC rule 3745-21-07(G)(2). Appropriate record keeping and reporting requirements to demonstrate compliance with OAC rule 3745-21-07(G)(2) shall be developed for this operation at that time.

2. Additional Terms and Conditions (continued)

- 2.b** 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

The above list was provided by the permittee based on information at the time of the application submittal, and is listed here for general information purposes only. This list is not necessarily up-to-date. Updated records of equipment counts are maintained by the permittee.

- 2.c** Exempted from the requirements of sections A.III.4 to A.III.14 of this rule is any equipment not in VOC service, as determined in accordance with paragraph (O)(2) of rule 3745-21-10 of the Administrative Code, and any equipment in vacuum service.

II. Operational Restrictions

1. The permittee shall operate a thermal incinerator and tails scrubber, or a flare shall be used as an alternate control device, whenever this emissions unit is in operation.
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. Operation of the thermal incinerator below the specified combustion temperature range is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

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 control device and monitoring equipment, when the associated emissions unit was 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. Except as otherwise provided in sections A.III.5 and A.III.6, equipment shall be monitored for leaks in accordance with the method specified in OAC rule 3745-21-10(F), as follows:
 - a. Any valve in gas/vapor service or in light liquid service shall be monitored monthly, except that quarterly monitoring may be employed anytime after no leaks are detected during two consecutive months. The quarterly monitoring shall begin with the next calendar quarter following the two consecutive months of no detected leaks and shall be conducted in the first month of each calendar quarter. The quarterly monitoring may continue until a leak is detected, at which time monthly monitoring shall be employed again.
 - b. Any of the following equipment shall be monitored within five calendar days after evidence of a leak or potential leak from the equipment by visual, audible, olfactory, or other detection method:
 - i. any pressure relief device in light liquid service or in heavy liquid service; and
 - ii. any flange or other connector.
 - c. Any equipment in which a leak is detected as described in section A.III.7 shall be monitored within five working days after each attempt to repair, unless the permittee believes that the equipment was not successfully repaired.

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

5. For any valve in gas/vapor service or in light liquid service, an alternative monitoring schedule may be employed in lieu of the monitoring schedule specified in section A.III.4.a as follows:
 - a. The valve is designated as difficult to monitor and is monitored each calendar year, provided the following conditions are met:
 - i. construction of the process unit commenced prior to May 9, 1986;
 - ii. the permittee of the valve demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than six feet above a support surface; and
 - iii. the permittee of the valve has a written plan that requires monitoring of the valve at least once per year.
 - b. The valve is designated as unsafe to monitor and is monitored as frequently as practical during safe to monitor times, provided the following conditions are met:
 - i. the permittee of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of monitoring on a monthly basis; and
 - ii. the permittee of the valve adheres to a written plan that requires monitoring of the valve as frequently as practical during safe to monitor times.
6. Excluded from the monitoring requirements of section A.III.4 is any valve that has no externally actuated stem penetrating the valve and that is designated for no detectable emissions.
7. A leak is detected when a concentration of ten thousand ppmv or greater is measured from a potential leak interface of any equipment that is monitored for leaks using the method specified in OAC rule 3745-21-10(F).
8. When a leak is detected as described in section A.III.7 of this rule, the following procedures shall be followed:
 - a. a weatherproof and readily visible identification tag, marked with the equipment identification number, is immediately attached to the leaking equipment;
 - b. a record of the leak and any attempt to repair the leak is entered into the leak repair log kept pursuant to section A.III.11;
 - c. the identification tag attached to the leaking equipment, other than a valve that is monitored pursuant to section A.III.4.a, may be removed after the leaking equipment is repaired; and
 - d. the identification tag attached to a leaking valve that is monitored pursuant to section A.III.4.a may be removed after the leaking valve is repaired, monitored for leaks for two consecutive months as specified in section A.III.4.a, and found to have no detected leaks during those two consecutive months.
9. When a leak is detected as described section A.III.7, the leaking equipment shall be repaired as soon as practicable, but no later than fifteen calendar days after the leak is detected, except for a delay of repair as provided in section A.III.15. Leaking equipment shall be deemed repaired if the maximum concentration measured pursuant to section A.III.4.c is less than ten thousand ppmv.
10. When a leak is detected as described section A.III.7, a first attempt at repair shall be made no later than five calendar days after the leak is detected; and the first attempts at repair shall include, but are not limited to, the following best practices where practicable:
 - a. tightening of bonnet bolts;
 - b. replacement of bonnet bolts;
 - c. tightening of packing gland nuts; and
 - d. injection of lubricant into lubricated packing.

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

11. When a leak is detected as described in section A.III.7, the following information shall be recorded in a leak repair log:
 - a. the identification number of the leaking equipment and, for leaks based on monitoring, the identification numbers of the leak detection instrument and its operator;
 - b. the basis for the detection of the leak; for example, monitoring, visual inspection, or sensor;
 - c. the date on which the leak was detected and the date of each attempt to repair the leaking equipment;
 - d. the methods of repair applied in each attempt to repair the leaking equipment;
 - e. one of the following entries within five working days after each attempt to repair the leaking equipment:
 - i. "not monitored," denoting the leaking equipment was presumed to still be leaking and it was not monitored; or
 - ii. if the leaking equipment was monitored with a leak detection instrument, the maximum concentration that was measured as follows:
 - (a) the actual reading in ppmv; or
 - (b) "below 10,000," denoting less than ten thousand ppmv; or
 - (c) "above 10,000," denoting not less than ten thousand ppmv;
 - f. if the leak is not repaired within fifteen calendar days after the date on which it was detected:
 - i. "repair delayed" and the reason for the delay;
 - ii. if repair is being delayed until the next process unit shutdown due to technical infeasibility of repair, the signature of the permittee whose decision it was that repair is technically infeasible without a process unit shutdown;
 - iii. the expected date of successful repair of the leak; and
 - iv. the dates of process unit shutdowns that occur while the leaking equipment is unrepaired; and
 - g. the date on which the leak was successfully repaired.
12. The leak repair log shall be retained by the permittee of the process unit in a readily accessible location for a minimum of two years after the date on which the record was made.
13. Pressure relief devices in gas/vapor service.
 - a. Any pressure relief device in gas/vapor service in the process unit shall comply with the requirements specified in sections A.III.13.b to A.III.13.d.
 - b. Except during pressure releases, the pressure relief device shall be operated with no detectable emissions, as indicated by an instrument reading of less than five hundred ppmv above background, as measured by the method specified in OAC rule 3745-21-10(F).
 - c. No later than five calendar days after a pressure release, the pressure relief device shall be tested to confirm the condition of no detectable emissions in accordance with the method specified in OAC rule 3745-21-10(F).
 - d. After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions as soon as practicable, but no later than five calendar days after the pressure release, except for a delay of repair as provided in section A.III.15.

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

14. Sampling connection system.
- a. Except as otherwise provided in section A.III.14.c, any sampling connection system in the process unit shall comply with the requirements specified in section A.III.14.b.
 - b. The sampling connection system shall be equipped with a closed purge system or a closed vent system that meets one of the following requirements:
 - i. the purged process fluid is returned directly to the process line with zero VOC emissions to the ambient air; or
 - ii. the purged process fluid is collected and recycled with zero VOC emissions to the ambient air.
 - c. Excluded from the requirements of section A.III.14.b is any sampling connection system that is an in-situ sampling system.
15. Delay of repair.
- a. A delay of repair that is employed pursuant to section A.III.9 or section A.III.13 shall be allowed only as provided in sections A.III.15.b to A.III.15.d.
 - b. A delay of repair shall be allowed if the repair is technically infeasible without a process unit shutdown. However, the repair shall occur before the end of the next process unit shutdown.
 - c. A delay of repair shall be allowed for a piece of equipment that is isolated from the process and that does not remain in VOC service (for example, isolated from the process and properly purged).
 - d. A delay of repair 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.
16. Record keeping.
- a. The permittee may use one record keeping system to comply with the record keeping requirements, provided the system identifies each record by each process unit.
 - b. The following information shall be recorded in a log that is kept in a readily accessible location:
 - i. a list of identification numbers for equipment subject to the requirements of sections A.III.4 to A.III.14;
 - ii. a list of identification numbers for pressure relief devices subject to section A.III.13; and
 - iii. for compliance tests required under section A.III.13.c:
 - (a) the date of each compliance test;
 - (b) the background level measured during each compliance test; and
 - (c) the maximum instrument reading measured at the equipment during each compliance test.
 - c. The following information pertaining to specific equipment that are exempt as provided in section A.I.2.c shall be recorded in a log that is kept in a readily accessible location:
 - i. a list of identification numbers of equipment in vacuum service; and
 - ii. a list of identification numbers of equipment not in VOC service and the information or data used to demonstrate that the equipment is not in VOC service.

IV. Reporting Requirements

1. (When Using Flare as the Control Device)
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 there was no pilot flame. The reports shall include the date, time, and duration of each such period.
2. (When Using Incinerator/Tails Scrubber as the Control Device)
The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the emissions unit was in operation and employing organic compounds and 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.
4. Semiannual reports shall be submitted to the Director by the first day of February and August and shall include the following information for the preceding semiannual periods:
 - a. the process unit identification;
 - b. the number of valves in gas/vapor service or in light liquid service excluding those valves designated for no detectable emission under the provision of section A.III.6;
 - c. for each month during the semiannual period:
 - i. the number of valves in gas/vapor service or in light liquid service for which leaks were detected as described in section A.III.7;
 - ii. the number of valves in gas/vapor service or in light liquid service for which leaks were not repaired within fifteen calendar days after the date of leak detection; and
 - iii. the facts that explain each delay of repair allowed pursuant to section A.III.15; and
 - d. the dates of process unit shutdowns that occurred within the semiannual period.
5. The results of compliance tests required under section A.III.13.c shall be reported semiannually to the Ohio Environmental Protection Agency District Office or delegate agency. The semiannual reports shall be submitted by the first day of February and August and shall include information for the preceding semiannual period.
6. Any semiannual reports required under section A.IV.4 may be sent to the Ohio Environmental Protection Agency District Office or delegate agency.

V. Testing Requirements

1. Testing requirements apply to the emissions unit with the thermal incinerator/tails scrubber used as the control device.

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 rate(s) and control requirements 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.
 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 demonstrated based upon 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: **Chloroformate Plant (P098)**

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

- 2.a Stack P098-S01 shall be continuously monitored for phosgene using two independent gas analysis systems. Alarm sensors shall be employed in the stack to activate the ammonium 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.
- 2.b The permittee shall employ an ammonia spray leak detection technique to monitor the components subject to the leak detection and repair program in the phosgene process unit. A leak is detected when the ammonia spray reacts with phosgene to form an ammonium chloride white vapor mist.
- 2.c The permittee shall leak-test all valves, flanges, and rupture disk exterior upon every process startup using the ammonia spray leak detection technique described in section B.I.2.b.
- 2.d Unless the permittee has successfully repaired a leak immediately on the first attempt, the permittee shall not employ the phosgene process until the leaking equipment is repaired and all leak tests are negative.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. All deviation (excursion) reports shall be submitted in accordance with section B.2 of the General Terms and Conditions.

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, unless reduced by 85%

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure at the packed tower scrubber outlet shall be maintained at a vacuum greater than or equal to 7" of water while the emissions unit is in operation, based upon an average value of all 3 shift readings for each day.

The scrubber water flow rate shall be maintained at a value of not less than 3.0 gallons per minute while the emissions unit is in operation, based upon an average value of all 3 shift readings for each day.
- Operation of the scrubber outside of the specified pressure drop range and/or flow rate is not necessarily indicative of an emission violation, but rather serves as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.

III. Monitoring and/or Record Keeping Requirements

1. 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:

- a. the pressure at the scrubber outlet, in inches of water, on a once per shift basis;
 - b. the daily average pressure at the scrubber outlet for each of the 3 shift readings, in inches of water (average);
 - c. the scrubber water flow rate, in gallons per minute, on a once per shift basis;
 - d. the daily average scrubber water flow rate for each of the 3 shift readings, in gallons per minute (average); and
 - e. a log of the downtime for the control device and monitoring equipment, when the associated emissions unit was in operation.
2. 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 Term 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 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 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.

V. Testing Requirements (continued)

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,
unless reduced by 85%

Applicable Compliance Method:

Compliance shall be demonstrated based upon 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>
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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