



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

**RE: PERMIT TO INSTALL  
HAMILTON COUNTY  
Application No: 14-04679**

**CERTIFIED MAIL**

X	TOXIC REVIEW
	PSD
X	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED

**DATE:** February 16, 2000

Imperial Adhesives  
Dan Noe  
6315 Wiehe Road  
Cincinnati, OH 45237

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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 within thirty (30) days after the 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. 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

Very truly yours,

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

cc: USEPA  
HAMILTON COUNTY DEPT OF ENV SERVICES



**Permit To Install  
Terms and Conditions**

**Issue Date: February 16, 2000  
Effective Date: February 16, 2000**

**PERMIT TO INSTALL 14-04679**

Application Number: 14-04679

APS Premise Number: 1431070069

Permit Fee: **\$2800**

Name of Facility: Imperial Adhesives

Person to Contact: Dan Noe

Address: 6315 Wiehe Road  
Cincinnati, OH 45237

Location of proposed air contaminant source(s) [emissions unit(s)]:

**6315 Wiehe Road  
Cincinnati, OHIO**

Description of proposed emissions unit(s):

**FIVE PROCESSES FOR PRODUCING SOLVENT-BASED ADHESIVES AND FINISHES.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

\_\_\_\_\_  
Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### **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. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

#### **9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed

sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

#### **10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

#### **11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

#### **12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

#### **13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

#### **14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility

has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. 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. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	22.03

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
Solvent adhesives process	OAC rule 3745-31-05	7.3 TPY OC
	OAC rule 3745-21-07 (G)(2)	8 lbs. OC/hr.; 40 lbs. OC/day
	OAC rule 3745-15-07	See Part I, Term A.7

2. **Additional Terms and Conditions**

- 2.a The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based upon a rolling, 12-month summation.
- 2.b The maximum organic compound content of the materials produced in emissions unit P020 shall not exceed 25%, by weight.
- 2.c Compliance with OAC rule 3745-31-05 shall be demonstrated by the HAP and organic compound content limits, emission limits and compliance with the air toxics policy.

**B. Operational Restrictions**

1. The permittee shall store any cloths used in the cleanup of any of the mixing or drum filling equipment in a covered container. The lid shall be kept closed on the storage container(s) at all times, except when cloths are removed from or returned to the container.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for the entire facility:
  - a. the name and identification number of each raw material, employed;

**Imperial Adhesives**

PTI Application: **14-04679**  
**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P020**

- b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each raw material in pounds of individual HAP per gallon of raw material, as applied;
  - c. the total combined HAP content of each raw material in pounds of combined HAPs per gallon of raw material, as applied [sum all the individual HAP contents from (b)];
  - d. the number of gallons of each raw material employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
  - h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP emissions for each HAP from all raw materials and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each raw material plus the sum of (f) times (h) for each cleanup material];
  - j. the total combined HAP emissions from all raw materials and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
  - k. the updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and,
  - l. the updated rolling, 12-month summation for the total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - \* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
2. The permittee shall collect and record the following information each day for all materials, including cleanup materials, employed in this emissions unit:
- a. the company identification for each raw material, including cleanup material, employed;

**Imperial Adhesives**

PTI Application: **14-04679**  
**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P020**

- b. the number of pounds and gallons of each raw material employed, including cleanup material;
- c. the organic compound content of each raw material, including cleanup material, in pounds of organic compounds per gallon and pounds of organic compounds per pound of material;
- d. the total organic compound emission rate for all raw materials, including cleanup materials, in pounds per day;
- e. the total number of hours the emissions unit was in operation;
- f. the average hourly organic compound emission rate for all raw materials, including cleanup materials, i.e., (d)/(e), in pounds per hour (average); and,
- g. the organic compound content of each final material produced, in percent by weight.

[Note: The organic material information must be for the materials as employed, including any thinning solvents added at the emissions unit. Also, the definitions of “photochemically reactive” and “nonphotochemically reactive” are based upon OAC rule 3745-21-01(C)(5).]

- 3. The permittee shall maintain annual records for this emissions unit which list the following information:
  - a. the company identification of each material employed;
  - b. the amount of such material in inventory at the beginning of the calendar year, in pounds;
  - c. the amount of such material in inventory at the end of the calendar year, in pounds;
  - d. the amount of such material purchased and received during the calendar year, in pounds;
  - e. the amount of such material in adhesives and finishes manufactured during the calendar year, in pounds, and including cleanup material;
  - f. the amount of cleanup material in waste disposed of during the calendar year, in pounds (\*\*); and,
  - g. the annual organic compound emissions calculated by using the following mass balance formula:

Organic compound emissions = sum of (B+D-C-E-F) for each organic material employed.

- \*\* The permittee shall have the waste material analyzed quarterly to determine the amount (in percent by weight) of cleanup material in the waste. The permittee shall use this number to determine the amount (in pounds) of cleanup material being disposed of in waste and shall use it in term C.3.f. (Note: The permittee can simplify calculations by omitting waste analysis and

then calculating organic compound emissions = sum of (B+D-C-E) for each organic material employed. This will give an overestimation of emissions, but the permittee will still have to comply with 8 pounds OC/hour and 40 pounds OC/day using this method of calculation.

4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

**D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in term A.2.a. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 30 of each year.
3. The permittee shall submit deviation (excursion) reports for this emissions unit, which include the following information:
  - a. Any exceedances of the organic compound content limitations in this permit.
4. The permittee shall submit deviation (excursion) reports for this emissions unit which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the organic materials, including cleanup materials, exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the organic materials, including cleanup materials, exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

**E. Testing Requirements**

1. Compliance with the hazardous air pollutant emissions limitations in term A.2.a. shall be determined by the recordkeeping required in term C.1.

**Imperial Adhesives**

PTI Application: **14-04679**  
**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P020**

2. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the materials, including cleanup materials, employed in this emissions unit.
3. Compliance with the organic compound emissions limitations in term A.1. shall be determined by the recordkeeping required in term C.2.
4. Compliance with the organic compound content limitation in term A.2.b. shall be determined by the recordkeeping required in term C.2.
5. The hourly production rate for emissions unit P020 can be calculated according to the following formula:

$$\text{Allowable Production rate} = \frac{8 \text{ lbs. OC/hour} * 2000 \text{ lbs/ton}}{(\text{Pounds material/hour}) (\text{Solvent fraction}) * 30 \text{ lbs/ton}}$$

where solvent fraction = the percent of production materials that contain OC / 100. Example: 5% solvent = 0.05 solvent fraction

6. The daily production rate for emissions unit P020 can be calculated according to the following formula:

$$\text{Allowable production rate} = \frac{40 \text{ lbs. OC/day} * 2000 \text{ lbs/ton}}{(\text{Pounds material/day}) (\text{Solvent fraction}) * 30 \text{ lbs/ton}}$$

where solvent fraction = the percent of the production materials that contain OC/100. Example: 5% solvent = 0.05 solvent fraction

**F. Miscellaneous Requirements**

1. If probable cause exists indicating this emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

**Imperial Adhesives**

PTI Application: **14-04679**  
**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P020**

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 11.8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4256

MAGLC (ug/m3): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a “modification”:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**Imperial Adhesives**

PTI Application: **14-04679**

**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P020**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
Solvent-based finishes process	OAC rule 3745-31-05	7.3 TPY OC
	OAC rule 3745-21-07(G)(2)	8 lbs. OC/hr.; 40 lbs. OC/day
	OAC rule 3745-15-07	See Part I, Term A.7

2. **Additional Terms and Conditions**

- 2.a The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based upon a rolling, 12-month summation.
- 2.b The maximum organic compound content of the materials produced in emissions unit P023 shall not exceed 100%, by weight.
- 2.c Compliance with OAC rule 3745-31-05 shall be demonstrated by the HAP and organic compound content limits, emission limits and compliance with the air toxics policy.

**B. Operational Restrictions**

1. The permittee shall store any cloths used in the cleanup of any of the mixing or drum filling equipment in a covered container. The lid shall be kept closed on the storage container(s) at all times, except when cloths are removed from or returned to the container.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for the entire facility:
  - a. the name and identification number of each raw material, employed;

- b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each raw material in pounds of individual HAP per gallon of raw material, as applied;
  - c. the total combined HAP content of each raw material in pounds of combined HAPs per gallon of raw material, as applied [sum all the individual HAP contents from (b)];
  - d. the number of gallons of each raw material employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
  - h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP emissions for each HAP from all raw materials and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each raw material plus the sum of (f) times (h) for each cleanup material];
  - j. the total combined HAP emissions from all raw materials and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
  - k. the updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and,
  - l. the updated rolling, 12-month summation for the total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - \* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
2. The permittee shall collect and record the following information each day for all materials, including cleanup materials, employed in this emissions unit:
- a. the company identification for each raw material, including cleanup material, employed;

**Imperial Adhesives**

PTI Application: **14-04679**  
**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P023**

- b. the number of pounds and gallons of each raw material employed, including cleanup material;
- c. the organic compound content of each raw material, including cleanup material, in pounds of organic compounds per gallon and pounds of organic compounds per pound of material;
- d. the total organic compound emission rate for all raw materials, including cleanup materials, in pounds per day;
- e. the total number of hours the emissions unit was in operation;
- f. the average hourly organic compound emission rate for all raw materials, including cleanup materials, i.e., (d)/(e), in pounds per hour (average); and,
- g. the organic compound content of each final material produced, in percent by weight.

[Note: The organic material information must be for the materials as employed, including any thinning solvents added at the emissions unit. Also, the definitions of “photochemically reactive” and “nonphotochemically reactive” are based upon OAC rule 3745-21-01(C)(5).]

- 3. The permittee shall maintain annual records for this emissions unit which list the following information:
  - a. the company identification of each material employed;
  - b. the amount of such material in inventory at the beginning of the calendar year, in pounds;
  - c. the amount of such material in inventory at the end of the calendar year, in pounds;
  - d. the amount of such material purchased and received during the calendar year, in pounds;
  - e. the amount of such material in adhesives and finishes manufactured during the calendar year, in pounds, and including cleanup material;
  - f. the amount of cleanup material in waste disposed of during the calendar year, in pounds (\*\*); and,
  - g. the annual organic compound emissions calculated by using the following mass balance formula:

Organic compound emissions = sum of (B+D-C-E-F) for each organic material employed.

- \*\* The permittee shall have the waste material analyzed quarterly to determine the amount (in percent by weight) of cleanup material in the waste. The permittee shall use this number to determine the amount (in pounds) of cleanup material being disposed of in waste and shall use it in term C.3.f. (Note: The permittee can simplify calculations by omitting waste analysis and

then calculating organic compound emissions = sum of (B+D-C-E) for each organic material employed. This will give an overestimation of emissions, but the permittee will still have to comply with 8 pounds OC/hour and 40 pounds OC/day using this method of calculation.

4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

**D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in term A.2.a. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 30 of each year.
3. The permittee shall submit deviation (excursion) reports for this emissions unit, which include the following information:
  - a. Any exceedances of the organic compound content limitations in this permit.
4. The permittee shall submit deviation (excursion) reports for this emissions unit which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the organic materials, including cleanup materials, exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the organic materials, including cleanup materials, exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

**E. Testing Requirements**

1. Compliance with the hazardous air pollutant emissions limitations in term A.2.a. shall be determined by the recordkeeping required in term C.1.

**Imperial Adhesives**

PTI Application: **14-04679**  
**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P023**

2. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the materials, including cleanup materials, employed in this emissions unit.
3. Compliance with the organic compound emissions limitations in term A.1. shall be determined by the recordkeeping required in term C.2.
4. Compliance with the organic compound content limitation in term A.2.b. shall be determined by the recordkeeping required in term C.2.
5. The hourly production rate for emissions unit P023 can be calculated according to the following formula:

$$\text{Allowable Production rate} = \frac{8 \text{ lbs. OC/hour} * 2000 \text{ lbs/ton}}{(\text{Pounds material/hour}) (\text{Solvent fraction}) * 30 \text{ lbs/ton}}$$

where solvent fraction = the percent of production materials that contain OC / 100. Example: 5% solvent = 0.05 solvent fraction

6. The daily production rate for emissions unit P023 can be calculated according to the following formula:

$$\text{Allowable production rate} = \frac{40 \text{ lbs. OC/day} * 2000 \text{ lbs/ton}}{(\text{Pounds material/day}) (\text{Solvent fraction}) * 30 \text{ lbs/ton}}$$

where solvent fraction = the percent of the production materials that contain OC/100. Example: 5% solvent = 0.05 solvent fraction

**F. Miscellaneous Requirements**

1. If probable cause exists indicating this emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

**Imperial Adhesives**

PTI Application: **14-04679**  
**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P023**

Pollutant: Methyl Ethyl Ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 16.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7654

MAGLC (ug/m3): 14,048

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a “modification”:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
Water-based finishes process	OAC rule 3745-31-05	7.3 TPY OC
	OAC rule 3745-21-07(G)(2)	8 lbs. OC/hr.; 40 lbs. OC/day
	OAC rule 3745-15-07	See Part I, Term A.7

2. **Additional Terms and Conditions**

- 2.a The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based upon a rolling, 12-month summation.
- 2.b The maximum organic compound content of the materials produced in emissions unit P024 shall not exceed 85%, by weight.
- 2.c Compliance with OAC rule 3745-31-05 shall be demonstrated by the HAP and organic compound content limits, emission limits and compliance with the air toxics policy.

**B. Operational Restrictions**

1. The permittee shall store any cloths used in the cleanup of any of the mixing or drum filling equipment in a covered container. The lid shall be kept closed on the storage container(s) at all times, except when cloths are removed from or returned to the container.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for the entire facility:
  - a. the name and identification number of each raw material, employed;

**Imperial Adhesives**

PTI Application: **14-04679**  
**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P024**

- b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each raw material in pounds of individual HAP per gallon of raw material, as applied;
  - c. the total combined HAP content of each raw material in pounds of combined HAPs per gallon of raw material, as applied [sum all the individual HAP contents from (b)];
  - d. the number of gallons of each raw material employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
  - h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP emissions for each HAP from all raw materials and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each raw material plus the sum of (f) times (h) for each cleanup material];
  - j. the total combined HAP emissions from all raw materials and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
  - k. the updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and,
  - l. the updated rolling, 12-month summation for the total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
  - \* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
2. The permittee shall collect and record the following information each day for all materials, including cleanup materials, employed in this emissions unit:
- a. the company identification for each raw material, including cleanup material, employed;

**Imperial Adhesives**

PTI Application: **14-04679**  
**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P024**

- b. the number of pounds and gallons of each raw material employed, including cleanup material;
- c. the organic compound content of each raw material, including cleanup material, in pounds of organic compounds per gallon and pounds of organic compounds per pound of material;
- d. the total organic compound emission rate for all raw materials, including cleanup materials, in pounds per day;
- e. the total number of hours the emissions unit was in operation;
- f. the average hourly organic compound emission rate for all raw materials, including cleanup materials, i.e., (d)/(e), in pounds per hour (average); and,
- g. the organic compound content of each final material produced, in percent by weight.

[Note: The organic material information must be for the materials as employed, including any thinning solvents added at the emissions unit. Also, the definitions of “photochemically reactive” and “nonphotochemically reactive” are based upon OAC rule 3745-21-01(C)(5).]

- 3. The permittee shall maintain annual records for this emissions unit which list the following information:
  - a. the company identification of each material employed;
  - b. the amount of such material in inventory at the beginning of the calendar year, in pounds;
  - c. the amount of such material in inventory at the end of the calendar year, in pounds;
  - d. the amount of such material purchased and received during the calendar year, in pounds;
  - e. the amount of such material in adhesives and finishes manufactured during the calendar year, in pounds, and including cleanup material;
  - f. the amount of cleanup material in waste disposed of during the calendar year, in pounds (\*\*); and,
  - g. the annual organic compound emissions calculated by using the following mass balance formula:

Organic compound emissions = sum of (B+D-C-E-F) for each organic material employed.

\*\* The permittee shall have the waste material analyzed quarterly to determine the amount (in percent by weight) of cleanup material in the waste. The permittee shall use this number to determine the amount (in pounds) of cleanup material being disposed of in waste and shall use it in term C.3.f.

(Note: The permittee can simplify calculations by omitting waste analysis and then calculating organic compound emissions = sum of (B+D-C-E) for each organic material employed. This will give an overestimation of emissions, but the permittee will still have to comply with 8 pounds OC/hour and 40 pounds OC/day using this method of calculation.

4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### **D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in term A.2.a. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 30 of each year.
3. The permittee shall submit deviation (excursion) reports for this emissions unit, which include the following information:
  - a. Any exceedances of the organic compound content limitations in this permit.
4. The permittee shall submit deviation (excursion) reports for this emissions unit which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the organic materials, including cleanup materials, exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. An identification of each day during which the organic compound emissions from the organic materials, including cleanup materials, exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

#### **E. Testing Requirements**

1. Compliance with the hazardous air pollutant emissions limitations in term A.2.a. shall be determined

by the recordkeeping required in term C.1.

2. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the materials, including cleanup materials, employed in this emissions unit.
3. Compliance with the organic compound emissions limitations in term A.1. shall be determined by the recordkeeping required in term C.2.
4. Compliance with the organic compound content limitation in term A.2.b. shall be determined by the recordkeeping required in term C.2.
5. The hourly production rate for emissions unit P024 can be calculated according to the following formula:

$$\text{Allowable Production rate} = \frac{8 \text{ lbs. OC/hour} * 2000 \text{ lbs/ton}}{(\text{Pounds material/hour}) (\text{Solvent fraction}) * 30 \text{ lbs/ton}}$$

where solvent fraction = the percent of production materials that contain OC / 100. Example: 5% solvent = 0.05 solvent fraction

6. The daily production rate for emissions unit P024 can be calculated according to the following formula:

$$\text{Allowable production rate} = \frac{40 \text{ lbs. OC/day} * 2000 \text{ lbs/ton}}{(\text{Pounds material/day}) (\text{Solvent fraction}) * 30 \text{ lbs/ton}}$$

where solvent fraction = the percent of the production materials that contain OC/100. Example: 5% solvent = 0.05 solvent fraction

## **F. Miscellaneous Requirements**

1. If probable cause exists indicating this emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for

**Imperial Adhesives**

PTI Application: **14-04679**  
**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P024**

each pollutant:

Pollutant: Methyl Ethyl Ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 16.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7654

MAGLC (ug/m3): 14,048

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**Imperial Adhesives**

PTI Application: **14-04679**

**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P024**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
Small orders for adhesives and finishes	OAC rule 3745-31-05	0.5 lb/hr., 12 lbs. OC/ day and 0.13 TPY OC
	OAC rule 3745-21-07(G)(2)	Less stringent than OAC rule 3745-31-05.
	OAC rule 3745-15-07	See Part I, Term A.7

**2. Additional Terms and Conditions**

- 2.a The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based upon a rolling, 12-month summation.
- 2.b The maximum organic compound content of the materials produced in emissions unit P025 shall not exceed 96%, by weight.
- 2.c This emissions unit potential to emit is less than the allowable emission limitation(s) established in OAC rule 3745-21-07(G)(2). Therefore, no hourly and daily records are required to demonstrate compliance with these limits.
- 2.d Compliance with OAC rule 3745-31-05 shall be demonstrated by the HAP and organic compound content limits, emission limits and compliance with the air toxics policy.

**B. Operational Restrictions**

1. The permittee shall store any cloths used in the cleanup of any of the mixing or drum filling equipment in a covered container. The lid shall be kept closed on the storage container(s) at all times, except when cloths are removed from or returned to the container.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for the entire facility:
  - a. the name and identification number of each raw material, employed;
  - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each raw material in pounds of individual HAP per gallon of raw material, as applied;
  - c. the total combined HAP content of each raw material in pounds of combined HAPs per gallon of raw material, as applied [sum all the individual HAP contents from (b)];
  - d. the number of gallons of each raw material employed;
  - e. the name and identification of each cleanup material employed;
  - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
  - h. the number of gallons of each cleanup material employed;
  - i. the total individual HAP emissions for each HAP from all raw materials and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each raw material plus the sum of (f) times (h) for each cleanup material];
  - j. the total combined HAP emissions from all raw materials and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
  - k. the updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months;

**Imperial Adhesives**

PTI Application: **14-04679**  
**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P025**

- l. the updated rolling, 12-month summation for the total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and,
  - m. the organic compound content of each final material produced, in percent by weight.
  - \* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
2. The permittee shall maintain annual records for this emissions unit which list the following information:
- a. the company identification of any material employed;
  - b. the amount of such material in inventory at the beginning of the calendar year, in pounds;
  - c. the amount of such material in inventory at the end of the calendar year, in pounds;
  - d. the amount of such material purchased and received during the calendar year, in pounds;
  - e. the amount of such material in adhesives and finishes manufactured during the calendar year, in pounds, and including cleanup material;
  - f. the amount of cleanup material in waste disposed of during the calendar year, in pounds (\*\*); and,
  - g. the annual organic compound emissions calculated by using the following mass balance formula:

Organic compound emissions = sum of (B+D-C-E-F) for each organic material employed.

\*\* The permittee shall have the waste material analyzed quarterly to determine the amount (in percent by weight) of cleanup material in the waste. The permittee shall use this number to determine the amount (in pounds) of cleanup material being disposed of in waste and shall use it in term C.3.f.

(Note: The permittee can simplify calculations by omitting waste analysis and then calculating organic compound emissions = sum of (B+D-C-E) for each organic material employed. This will give an overestimation of emissions, but the permittee will still have to comply with 8 pounds OC/hour and 12 pounds OC/day using this method of calculation.

- h. The organic compound content of each material, including cleanup material, in pounds of organic compounds per gallon and pounds of organic compounds per pound of material;

3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
  - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

**D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in term A.2.a. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
2. The permittee shall submit deviation (excursion) reports for this emissions unit, which include the following information:
  - a. Any exceedances of the organic compound content limitations in this permit.

**E. Testing Requirements**

1. Compliance with the hazardous air pollutant emissions limitations in term A.2 shall be determined by the recordkeeping required in term C.1.
2. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the materials, including cleanup materials, employed in this emissions unit.
3. Compliance with the organic compound emissions limitations in term A.2 shall be determined by the recordkeeping required in term C.2. and AP-42 emissions factors for paint and varnish manufacturing.

**F. Miscellaneous Requirements**

1. If probable cause exists indicating this emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used

**Imperial Adhesives**

PTI Application: **14-04679**  
**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P025**

and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 11.8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4256

MAGLC (ug/m3): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

**Imperial Adhesives**

PTI Application: **14-04679**  
**2/16/00**

Facility ID: **1431070069**

Emissions Unit ID: **P025**

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.