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Facility Name: **Janesville Products, Plant #60**

Application Number: **03-3073**

Date: **October 28, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 source(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 Ohio Administrative Code (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.

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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 cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

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SOURCE OPERATION 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 and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Janesville Products, Plant #60** located in **Huron** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>
P001 (mod)	dry oven #1 (for non-woven textiles): the purpose of this PTI is to increase the PM limitation and establish OC emission limitations
P002 (new cont-d)	
P002 (new)	dry oven #2 (for non-woven Textiles)

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BAT
Determination

Compliance
with
Ohio EPA's Air
Toxics Policy
and with the
terms
and conditions
of this permit

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Applicable
Federal &
OAC Rules

3745-31-05

3745-17-11 (B)
3745-17-07 (A)

3745-31-05

3745-17-11 (B)
3745-17-07 (A)

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		OC/hour, 18.2 tons/year		
	Permit Allowable Mass Emissions and/or Control/Usage Requirements	1.27 pounds particulate matter PM/hour, 5.56 tons/year	* visible PM shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule	
		4.20 pounds OC/hour, 18.4 tons/year		
			* visible PM shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule	
		1.68 pounds particulate matter PM/hour, 7.36 tons/year		
		4.15 pounds		

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- * The emission limitations established under this applicable rule are less stringent than those established pursuant to OAC rule 3745-31-05.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	12.9
OC	36.6

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

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In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

INTRODUCTION: Oven #1 (P001) was originally permitted under PTI No. 03-8253 and only PM limitations were established. Oven #2 (P002) was originally considered to be "De Minimis" and therefore, a PTI application was not submitted prior to its installation. Based upon recent testing conducted on these units, the company has discovered the presence of OC emissions from both ovens and PM higher than the allowable emission rate. The purpose of this PTI is to increase the PM limitation for P001, add an OC limitation to P001, and correct the permitting deficiency for P002.

A. APPLICABLE EMISSION LIMITATIONS AND/OR CONTROL REQUIREMENTS

No additional emission limitations and/or control requirements other than those identified in the Air Emission Summary section of this permit.

B. OPERATIONAL RESTRICTIONS

1. This permit allows for the use of the materials in emissions units P001 and P002 specified by the permittee in PTI application number 03-13073. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitations specified in this permit were established

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in accordance with Ohio EPA's "Air Toxics Policy" and are based on both the material formulation data and the design parameters of each emissions unit's exhaust system, as specified in the application. As the OC emissions do not consist of compounds which have TLVs established and do not contain Hazardous Air Pollutants (HAP), dispersion modeling using the Screen 3 model was not required.

Any of the following changes may be deemed a "modification" to the emissions units and, as such, prior notification to and approval from the Ohio EPA Northwest District Office are required:

- a. any change in the composition of the materials, or the use of new materials, that would result in the emission of a compound with an established Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled American Conference of Governmental Industrial Hygienists (ACGIH);
- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC;
- c. any change to the emissions unit or its method of operation that would either 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; and,
- d. any change in the composition of the materials that would increase the content of "Hazardous Air Pollutants" (HAPs) as defined in OAC 3745-77-01 (V).

C. MONITORING AND/OR RECORDKEEPING REQUIREMENTS

1. The permittee shall perform weekly checks, when emissions units P001 and/or P002 are in operation and when the weather conditions allow, for any visible particulate emissions from the respective stacks serving the units. The presence or absence of any visible emissions shall be noted in an operations log (one maintained for each emissions unit). If visible emissions are observed, the permittee shall also note

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the following in the operations logs:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and,
- e. any corrective actions taken to eliminate the visible emissions.

D. REPORTING REQUIREMENTS

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the respective stacks serving the emissions units and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. TESTING REQUIREMENTS/COMPLIANCE METHODS DETERMINATION

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation: P001 - 1.27 pound PM/hour, 5.56 tons/year

Applicable Compliance Method: The hourly PM limitation is based on the emissions testing which was conducted by the company at a process weight rate of 2500 pounds of fiber textiles/hour, increased by a factor of 1.2. The annual PM limitation is based on the hourly limitation at 8760 hours/year. If required, compliance with the

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PM limitation shall be determined in accordance with the test methods and procedures in USEPA Method 5, which is located in 40 CFR Part 60, Appendix A.

- b. Emission Limitation: P001 - 4.20 pounds OC/hour, 18.4 tons/year

Applicable Compliance Method: The hourly OC emission limitation is based on the emissions testing which was conducted by the company at a process weight rate of 2500 pounds of fiber textiles/hour, increase by a factor of 1.2. The annual OC emission limitation is based on the hourly limitation at 8760 hours/year. If required, compliance with the OC emission limitation shall be determined in accordance with the test methods and procedures in USEPA Method 25, which is located in 40 CFR Part 60, Appendix A.

- c. Emission Limitation: P002 - 1.68 pound PM/hour, 7.36 tons/year

Applicable Compliance Method: The hourly PM limitation is based on the emissions testing which was conducted by the company at a process weight rate of 2500 pounds of fiber textiles/hour, increased by a factor of 1.2. The annual PM limitation is based on the hourly limitation at 8760 hours/year. If required, compliance with the PM limitation shall be determined in accordance with the test methods and procedures in USEPA Method 5, which is located in 40 CFR Part 60, Appendix A.

- d. Emission Limitation: P002 - 4.15 pounds OC/hour, 18.2 tons/year

Applicable Compliance Method: The hourly OC emission limitation is based on the emissions testing which was conducted by the company at a process weight rate of 2500 pounds of fiber textiles/hour, increase by a factor of 1.2. The annual OC emission limitation is based on the

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hourly limitation at 8760 hours/year. If required, compliance with the OC emission limitation shall be determined in accordance with the test methods and procedures in USEPA Method 25, which is located in 40 CFR Part 60, Appendix A.

- e. Emission Limitation: P001 and P002 - visible PM shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule

Applicable Compliance Method: The permittee shall demonstrate compliance with this visible PM limitation through the monitoring/record keeping and reporting requirements of this permit. If required, the permittee may demonstrate compliance with the visible PM limitation by using the method detailed in OAC rule 3745-17-03(B)(1).

NOTE: No term or condition specifying a method for demonstrating compliance with any emission limitation or other requirement of this permit shall preclude the use by any person of any credible evidence to establish compliance with or a violation of this permit, the Clean Air Act, or any implementing regulations or rules promulgated thereunder.

F. MISCELLANEOUS REQUIREMENTS

- 1. The terms and conditions of this permit shall supersede all of the air pollution control requirements contained in PTI application number 03-8253 which was issued for this emissions unit on November 9, 1994.