



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 13-04002

DATE: 2/4/2003

Kirkwood Industries, Incorporated
Julie Lowry
4855 West 130th Street
Cleveland, OH 441355182

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 Directors 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,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

CBAPC



**Permit To Install
Terms and Conditions**

**Issue Date: 2/4/2003
Effective Date: 2/4/2003**

FINAL PERMIT TO INSTALL 13-04002

Application Number: 13-04002
APS Premise Number: 1318001603
Permit Fee: **\$800**
Name of Facility: Kirkwood Industries, Incorporated
Person to Contact: Julie Lowry
Address: 4855 West 130th Street
Cleveland, OH 441355182

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4857 West 130th Street
Cleveland, Ohio**

Description of proposed emissions unit(s):
New room with cold sigma mixer (P020); Drying oven with 3 independent compartments (P021).

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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

6

Kirkwood Industries, Incorporated
PTI Application: 13-04002
Issued: 2/4/2003

Facility ID: 1318001603

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>
PM	1.58
PM10	0.22
OC	75.41

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>
P020 - New mixing room with cold sigma mixer.	OAC rule 3745-31-05(A)(3)	0.36 lb PE/hr 1.58 tpy PE
		0.05 lb PM10/hr 0.22 tpy PM10
		3.63 lb OC/hr 15.87 tpy OC See section A.2.a.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	Visible particulate emission from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(A)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	See section A.2.b.

2. Additional Terms and Conditions

- 2.a** Photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5), shall not be employed in this emissions unit.
- 2.b** No photochemically reactive materials as defined in OAC Rule 3745-21-01(C)(5) are employed, applied, evaporated, or dried in this emissions unit. Therefore, there is no applicable OC emission limitation from this rule.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each day for this emissions unit:
 - a. the number of hours the emissions unit was in operation;
 - b. the total amount of mix produced, in tons per day;
 - c. the average mix production rate, in tons per hour (b/a);
 - d. the company identification for each liquid organic material (i.e., acetone) employed;
 - e. the total mass rate of each liquid organic material employed per batch, in pound per batch, for P020 and P021 combined;
 - f. the total operating time for each batch, in hours per batch; and
 - g. the total organic compound emission rate for all liquid organic materials, in pounds per hour, will be determined in accordance with Section E.1.f.

2. The permittee shall perform daily checks, when the emissions unit is in operation, for visible particulate emissions from the stack egress point from the building housing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

3. This permit allows the use of materials (typically solvents and mixing liquid 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 limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (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:

Pollutant:	Acetone
TLV (ug/m3):	1,187,117 ug/m ³
Maximum Hourly Emission Rate):	3.63 lbs/hr
Predicted 1 Hour Maximum Ground-Level Concentration:	5,175 ug/m ³
Maximum Acceptable Ground-Level Concentration (MAGLC):	94,969 ug/m ³

4. 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

Emissions Unit ID: **P020**

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.
5. 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.
6. 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.
7. 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 submit semiannual written reports to the Cleveland Division of Air Quality (Cleveland DAQ) which (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions.
2. The permittee shall submit deviation (excursion) reports to the Cleveland DAQ which identify each day during which the average hourly total organic compound emissions exceeded 3.63 pounds per hour. These reports shall be submitted within 30 days of the occurrence of the deviation.
3. The permittee shall also submit annual reports to the Cleveland DAQ which specify the total organic compound emissions from this emissions unit for the previous calendar year.
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
0.36 lb PM/hr

Compliance with the hourly particulate emission limit shall be based on the summation of the particulate contributions from the mixing activity, and the oven processing activity, with the supporting information provided by the recordkeeping as listed in section C.1, the use of appropriate AP-42 emission factors, and operating efficiency of control device.

Emissions from the mixing activity shall be calculated through the use of the following equation:

$$E = [EF] \times [W]$$

E = hourly particulate emissions rate, (lb/hr);

EF = emission factor, (2.4 lb/ton production, as listed in AP-42*, Table 11.24-2);

W = average production rate (ton/hr) of the mixing production schedule.

Emissions Unit ID: **P020**

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

- b. Emission Limitation:
1.58 tpy PE

Applicable Compliance Method(s):

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- c. Emission Limitation:
0.05 lb PM10/hr

Compliance with the hourly PM10 emission limit shall be based on the summation of the particulate contributions from the mixing activity, and the oven processing activity, with the supporting information provided by the recordkeeping as listed in Section C.1, the use of appropriate AP-42 emission factors, and operating efficiency of control device.

Emissions from the mixing activity may be calculated through the use of the following equation:

$$E = [EF] \times [W]$$

E = hourly particulate emissions rate, (lb/hr);

EF = emission factor, (0.31 lb/ton production, as listed in AP-42*, Table 11.24-2);

W = average production rate (ton/hr) of the mixing production schedule.

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(10).

- d. Emission Limitation:
0.22 tpy PM10

Applicable Compliance Method(s):

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is

maintained with the pounds per hour limitation.

- e. Emission Limitation:
20% opacity, as a 6-minute average

Applicable Compliance Method(s):

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using methods and procedures specified in USEPA Reference Method 9.

- f. Emission Limitation:
3.63 pounds per hour of OC (all acetone)

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1, and through incorporation into the following formulation:

$$E = (U \times L) / T$$

where,

E = organic compounds emission rate [lbs/hr]

U = liquid organic usage rate [lb/batch]

T = operating time for each batch [hours/batch]

L = organic material estimated evaporative loss of 10 percent in accordance to mass balance analysis performed by the company, [%].

- g. Emission Limitation:
15.87 tons per year of OC (all acetone)

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

* AP-42, Compilation of Air Pollutant Emission Factors, Fifth Edition

Kirkwood Industries, Incorporated
PTI Application: 13-04002
Issued

Facility ID: 1318001603

Emissions Unit ID: **P020**

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the liquid materials employed in the emission unit.

F. Miscellaneous

None.

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>
P021 - Drying oven with three (3) independent compartments.	OAC rule 3745-31-05(A)(3)	326.25 lbs OC/day 59.54 tpy OC See section A.2.a.
	OAC rule 3745-21-07(G)(2)	See section A.2.b.

2. Additional Terms and Conditions

- 2.a Photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5), shall not be employed in this emissions unit.
- 2.b No photochemically reactive materials as defined in OAC Rule 3745-21-01(C)(5) are employed, applied, evaporated, or dried in this emissions unit. Therefore, there is no applicable OC emission limitation from this rule.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the mixing operation:
 - a. the company identification for each liquid material employed;

- b. the total amount, in pounds, of each liquid organic material (i.e., acetone) employed in emissions units P020 and P021 less ten percent due to evaporation loss from P020;
 - c. the total organic compound emission rate for all liquid organic materials, in pounds per day, calculated in accordance with Section E.1.a.
2. This permit allows the use of materials (typically solvents and mixing liquid 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 limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (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:

Pollutant:	Acetone
TLV (ug/m3):	1,187,117 ug/m ³
Maximum Hourly Emission Rate):	27.2 lbs/hr
Predicted 1 Hour Maximum Ground-Level Concentration:	16,700 ug/m ³
Maximum Acceptable Ground-Level Concentration (MAGLC):	79,141 ug/m ³

3. 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

Emissions Unit ID: **P021**

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.
4. 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.
 5. 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.
 - a.
 6. 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 submit deviation (excursion) reports to the Cleveland Division of Air Quality (Cleveland DAQ) which identify each day during which the average hourly total organic compound emissions exceeded 326.25 pounds per day. These reports shall be submitted within 30 days of the occurrence of the deviation.
2. The permittee shall also submit annual reports to the Cleveland DAQ which specify the total

organic compound emissions from this emissions unit for the previous calendar year.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
326.25 pounds per day of OC (all acetone)

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1, and through incorporation into the following formula:

$$E = C$$

where,

E = organic compounds emission rate [lbs/day]

C = amount of acetone per day [lb/day] - this is the total amount of acetone used for P020 and P021 combined minus 10% lost in P020.

- b. Emission Limitation:
59.54 tons per year of OC (all acetone)

Applicable Compliance Method:

The annual emission limitation was established by multiplying the daily emission rate by 365 days of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per day limitation.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the liquid materials employed in the emission unit.

F. Miscellaneous

20

Kirkwood Industries, Incorporated
PTI Application: 13 04003
Issued

Facility ID: 1318001603

Emissions Unit ID: P021

None