

Synthetic Minor Determination and/or Netting Determination

Permit To Install 13-04333

A. Source Description

Von Roll Isola - Midwest Mica is a mica manufacturing facility. This permit is for the installation of a banding tape line which will replace two mica laminating lines that have been removed.

B. Facility Emissions and Attainment Status

The facility applied for a FESOP in March of 2003. Total facility actual emissions in 2003 were 7.8 tons of VOC. Approximately 96% of the VOC currently used are HAPs. The facility has been restricted to HAP emissions below 10 tons/year any single HAP and 25 tons/year any combination of HAPs to avoid MACT and Title V implications. VOC is the main pollutant of concern. Cuyahoga County is designated as attainment for ozone.

C. Source Emissions

P017 has a potential to emit of 7.47 tpy of combined HAPs and 4.48 tpy of a single HAP (Toluene). The total VOC allowable has been set at 7.47 tpy. Single HAP emissions have been restricted to 9.9 tons/year, and combined HAP emissions to 24.9 tons/year. These HAP restrictions are for the total facility HAP emissions.

D. Conclusion

Facility Potential to Emit and actual emissions are below the Title V thresholds. This permit will restrict facility-wide HAPs to less than 9.9 tons/year any single HAP, and 24.9 tons/year any combination of HAPs. Due to these restrictions, Title V will not apply to this facility as the facility will be kept below the thresholds. MACT subpart JJJJ for Paper and Other Web Coatings was signed and effective on December 4, 2002, so the compliance deadline would be December 4, 2005. MACT subpart OOOO for Printing, Coating, and Dyeing of Fabrics and Other Textiles was signed and effective on May 29, 2003, so the compliance deadline would be May 29, 2006. Therefore, provided the FESOP for this facility is issued before this date, Midwest Mica will not be subject to these MACT requirements.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
CUYAHOGA COUNTY**

Street Address:

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

Mailing Address:

Lazarus Gov. Center

Application No: 13-04333

DATE: 7/13/2004

Von Roll Isola - Midwest Mica Division
Donna Mellon
1 West Campbell Road
Schenectady, NY 12306

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

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

CC: USEPA CLAA PA

CUYAHOGA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **13-04333** FOR AN AIR CONTAMINANT SOURCE FOR
VON ROLL ISOLA - MIDWEST MICA DIVISION

On 7/13/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Von Roll Isola - Midwest Mica Division**, located at **4853 West 130th Street, Cleveland**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04333:

Line No. 32 -- Banding Tape Machine -- P017.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue, Cleveland, OH 44114 [(216)664-2324]



**Permit To Install
Terms and
Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-04333

Application Number: 13-04333
APS Premise Number: 1318002663

Permit Fee: **To be entered upon final issuance**

Name of Facility: Von Roll Isola - Midwest Mica Division
Person to Contact: Donna Mellon
Address: 1 West Campbell Road
Schenectady, NY 12306

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4853 West 130th Street
Cleveland, Ohio**

Description of proposed emissions unit(s):
Line No. 32 -- Banding Tape Machine -- P017.

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

A. State and Federally Enforceable Permit To Install General Terms and Conditions**1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

Von Roll Isola - Midwest Mica Division

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6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

12. 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.

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B. State Only Enforceable 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

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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.

4. 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

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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.

5. 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.

6. 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.

7. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are

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required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. 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>
VOC	7.47
Single HAP for entire facility	9.9
Combined HAPs for entire facility	24.9

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

none

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

none

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	
P017 - Line No. 32 - Banding Tape Machine with associated mixer and 1.5 MMBtu/hr oven controlled by a thermal oxidizer	OAC rule 3745-31-05(A)(3)	OAC rule 3745-31-05(C) Synthetic minor to avoid MACT

OAC rule 3745-21-07(G)(1)

40 CFR 60, Subpart VVV

**Von R
PTI A**

Emissions Unit ID: P017

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Applicable Emissions
Limitations/Control
Measures

Volatile Organic Compound (VOC) emissions, from this emissions unit, shall not exceed 1.70 lbs/hr and 7.45 tons per year (TPY) from coatings, calculated as a 12-month rolling total.

VOC emissions, from this emissions unit, shall not exceed 0.2 TPY from cleanup materials, calculated as a 12-month rolling total.

The thermal oxidizer shall achieve a control (destruction) efficiency of at least 98 percent, by weight, and the capture efficiency of the permanent total enclosure(s) shall be at least 99.5 percent, by weight for VOC.

The requirements of this rule also include compliance with the requirements of 40 CFR 60, Subpart VVV.

The control efficiency limitation specified by this rule is less stringent than the control efficiency limitation established pursuant to OAC rule 3745-31-05(A)(3).

The control efficiency

limitation specified by this rule is less stringent than the control efficiency limitation established pursuant to OAC rule 3745-31-05(A)(3).

See sections A.I.2.a below.

See section A.I.2.b below.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** VOC emissions from the banding tape coating process, P017, will be collected in a permanent total enclosure and controlled by a thermal oxidizer. The mixing equipment associated with the banding tape coating preparation will be located within the permanent total enclosure so that all emissions from mixing of the banding tape coatings are captured and controlled.

These emissions will be directed to a thermal oxidizer with an efficiency of at least 98% by weight. The permanent total enclosure will conform with US EPA Method 204. Instead of monitoring coating usage, the facility has chosen to control the mixing associated with this emissions unit.

- 2.b** The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units at this facility shall not exceed 9.9 tons/year for any individual HAP and 24.9 tons/year for any combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation.
- 2.c** The current list of emissions units at this facility are B001, B002, B003, P001, P002, P003, P004, P005, P008, P009, P010, P011, P012, P013, P014, P015, P016, T001, T002, and T004.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour period when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The thermal oxidizer shall be operated and maintained such that the control efficiency, determined using Equation 1 specified in 40 CFR 60.743 and the test methods and procedures specified in 40 CFR 60.745 (b) through (g), is equal to or greater than 0.98. The permittee must monitor the thermal oxidizer pursuant to the requirements of 40 CFR 60.744(e) and comply with the reporting and record keeping requirements of 40 CFR 60.747(d).
3. The permanent total enclosure shall be maintained under negative pressure during the actual coating operation (except during setup, changeover or cleanup), monitoring reading shall not vary by 5 percent or more from the operating parameters established in the approved total enclosure monitoring plan, identified in section A.III.6 of this permit.

4. The maximum annual HAPs material usage for the list of emissions units referenced in section A.I.2.b shall not exceed 9.9 tons/year for any individual HAP and 24.9 tons/year for any combination of HAPs, based upon a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Individual HAPs Material Usage for the list of emissions units referenced in A.I.2.b	Maximum Allowable Cumulative Combined HAPs Material Usage for the list of emissions units referenced in A.I.2.b
1	2.0 tons	6.0 tons
1-2	3.0 tons	8.0 tons
1-3	4.0 tons	10.0 tons
1-4	5.0 tons	12.0 tons
1-5	6.0 tons	14.0 tons
1-6	7.0 tons	16.0 tons
1-7	7.5 tons	18.0 tons
1-8	8.0 tons	20.0 tons
1-9	8.5 tons	22.0 tons
1-10	9.0 tons	23.0 tons
1-11	9.5 tons	24.0 tons
1-12	9.9 tons	24.9 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP material usage limitation shall be based upon a rolling, 12-month summation of the HAP material usage figures.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day this emissions unit is in operation:
 - a. the name and identification number of each coating, as applied;
 - b. the name and identification number of each cleanup material dispensed;
 - c. the total amount, in pounds, of each coating applied including any reducer added at the line;
 - d. the amount, in pounds, of each cleanup material dispensed;

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- e. the total number of hours the emissions unit was in operation;
 - f. the VOC content of each coating and cleanup material, in pounds VOC per pound coating, as applied;
 - g. the total VOC emission rate for all coatings, in pounds and tons [summation of $(c \times f) \times (1 - \text{control efficiency established during most recent emission test})$ for all coatings];
 - h. the average hourly emission rate [(g/e)];
 - i. the amount, in pounds, of cleanup material that is contained for disposal; and
 - j. the total emission rate for cleanup material [$f(d-i) \times (1 - \text{control efficiency established during most recent emission test})$], in pounds and tons.
2. The permittee shall collect the records in section A.III.1 and use this information to determine, on a monthly basis the following:
 - a. the 12-month rolling VOC emissions in tons per year for all coatings.
 - b. the 12-month rolling VOC emissions in tons per year for all cleanup solvent.
 3. As specified in 40 CFR 60.744(a), (e), and (i) through (k), the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit or Celsius. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day this emissions unit is in operation:

- a. all 3-hour periods (during actual coating operations) during which the average combustion temperature within the combustion chamber of the thermal oxidizer was more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance;
- b. a log of the downtime for the capture (collection) system, control system, and monitoring

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equipment, when the associated emissions unit was in operation;

- c. all time periods of mixing or coating operations when the emission control device is malfunctioning or not in use; and
 - d. all time periods of mixing or coating operations when each monitoring device is malfunctioning or not in use.
4. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measures and records the pressure differential between the inside and the adjacent area outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. All 3-hour periods (during actual coating operations) during which the differences in pressure between the permanent total enclosure and the surrounding area(s) readings vary by 5 percent or more from the operating parameters established in the approved total enclosure monitoring plan, identified in section A.III.7.
5. As specified in 40 CFR 60.742(c)(3)(i) and (ii), the permittee shall install, operate, and maintain a cover on the mixing equipment associated with this emissions unit and vent the VOC emissions to the thermal oxidizer.
6. The permittee shall collect and record the following information each month for the entire facility:
- a. The name and identification number of each HAP containing material employed.
 - b. The individual HAP content for each HAP, in pounds of individual HAP per pound of material.
 - c. The total combined HAP content, in pounds of combined HAPs per pound of material [sum all the individual HAP contents from (b)].
 - d. The number of pounds of each HAP containing material employed.
 - e. The total individual HAP usage for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (b) times (d) for each material].
 - f. The total combined HAP usage from all HAP containing materials, in pounds or tons per

month [the sum of (c) times (d) for each material].

- g. The updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- h. The updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* 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 individual emissions unit basis.

- 7. The permittee shall prepare a monitoring plan for the total enclosure in accordance with 40 CFR 60.744(h). The total enclosure monitoring plan shall be submitted to the Director for approval with the notification of anticipated start-up required by this permit.
- 8. As specified in 40 CFR 60.744(k), the permittee shall maintain records of the measurements and calculations required in 40 CFR 60.743 and 60.744 for at least 2 years following the date of the measurements and calculations.

IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports for the items indicated below by April 30, July 31, October 31, and January 31, which shall cover the records for the previous calendar quarters:
 - a. As specified in 40 CFR 60.747(d)(4), all 3-hour periods (during actual coating operations) for the thermal oxidizer temperature monitoring when the temperature is more than 50 degrees Fahrenheit (28 degrees Celsius) below the temperature specified in section A.II.1; and,
 - b. As specified in 40 CFR 60.747(d)(6), all 3-hour periods(during actual coating operations) for the permanent total enclosure monitoring readings that vary by 5 percent or more from the operating parameters established in the approved total enclosure monitoring plan, identified in section A.III.7 of this permit.
- 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling 12-month emission limitation for VOC. This written report shall be submitted to the Cleveland Division of Air Quality within 30 days of the occurrence of the deviation.

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3. The permittee shall submit deviation (excursion) reports which include the following information for the list of emissions units referenced in section A.I.2.c:
 - a. An identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/year based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month;
 - b. An identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceeds 24.9 tons/year based on a rolling, 12-month summation, and the actual rolling, 12-month combined HAP emissions for each such month;

And, for the first 12 calendar months of operation following the issuance of this permit, reports shall be submitted identifying all exceedances of the maximum allowable cumulative HAP usage and emissions rate.

These written reports shall be submitted to the Cleveland Division of Air Quality within 30 days of the occurrence of the deviation.

4. As specified in 40 CFR 60.747(f), (g), and (h) the permittee shall submit the following:
 - a. All periods during actual mixing or coating operations when a required monitoring device (if any) was malfunctioning or not operating; and,
 - b. All periods during actual mixing or coating operations when the control device was malfunctioning or not operating.

These written reports shall be submitted to the Cleveland Division of Air Quality within 30 days of the occurrence of the deviation and these records shall be retained for at least two years.

V. Testing Requirements

1. Compliance with the emission limitation(s) and operation restriction specified in section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
VOC emissions shall not exceed 1.70 lbs/hr from coatings.

Applicable Compliance Method:

Compliance may be demonstrated in accordance with the record keeping requirements contained in section A.III of this permit. US EPA Methods 24 shall be used to determine the VOC content for each coating. If it is demonstrated to the satisfaction of the Director

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that each coating formulation data is equivalent to Method 24 results, formulation data based on weight percentage of VOC components in the coating may be used. In the event of any inconsistency between a Method 24 test and the facility's formulation data, the Method 24 test will govern.

If required by Ohio EPA or Cleveland Division of Air Quality, compliance with the VOC emission limitation shall be determined through emission testing conducted in accordance with US EPA Method 25 or 25A of 40 CFR Part 60, Appendix A, or any Ohio EPA approved alternative testing method.

- b. Emission Limitation:
VOC emissions shall not exceed 7.45 TPY from coatings.

Applicable Compliance Method:

Compliance shall be demonstrated on a monthly basis by summing the monthly VOC emissions as recorded in section A.III.2 above from this emissions unit during the most recent 12 calendar months of operation.

- c. Emission Limitation:
VOC emissions shall not exceed 0.2 TPY VOC from cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated on a monthly basis by summing the monthly VOC emissions as recorded in section A.III.2 above from this emissions unit during the most recent 12 calendar months of operation.

- d. Emission Limitation:
98 percent control (destruction) efficiency, by weight
99.5 percent capture efficiency, by weight for VOC.

Applicable Compliance Method:

Compliance with the control and capture efficiency shall be determined in accordance with the test methods and procedures specified in section A.V.2. of these terms and conditions or as specified by 40 CFR 60.743.

- e. Emission Limitation:
9.9 tons individual HAPs/year for the list of emissions units in section A.I.2.c as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in section

A.III.5.

- f. Emission Limitation:
24.9 tons combined HAPs/year for the list of emissions units in section A.I.2.c as a 12-month rolling summation.

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in section A.III.5.

2. As specified in 40 CFR 60.745, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months of the effective date of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture and destruction efficiency limitation for VOC emissions and the allowable hourly VOC mass rate of emissions.
 - c. Method 25 or 25A of 40 CFR Part 60, Appendix A, shall be employed to demonstrate compliance with the allowable mass emission rate and the destruction efficiency. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the US EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995.
 - d. The emission tests shall be conducted while the emissions unit is operating at or near its maximum operating capacity, unless otherwise specified or approved by Ohio EPA or Cleveland DAQ.
 - e. The average values of the monitored parameters shall be measured at least every 15 minutes and averaged over the period of the performance test and shall be submitted with the results of all performance tests, as specified in 40 CFR 60.747(a).
 - f. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and the outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and US EPA Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A. Formulation data from the manufacturer, or if required Method 24, shall be used to determine VOC contents of the coatings. Alternative US EPA approved test methods may be used with prior approval from the Ohio EPA or Cleveland DAQ.

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Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to tests may result in the Cleveland DAQ's refusal to accept the results of this emission tests.

Personnel from the Cleveland DAQ shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emission unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions tests shall be signed by the person or person responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the tests.

VI. Miscellaneous Requirements

None.

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B. State Only Enforceable Section

I. 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>
P017 - Line No. 32 - Banding Tape Machine	None	Air Toxics Requirements

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P017) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hours maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: Toluene
 TLV ($\mu\text{g}/\text{m}^3$): 188,405
 Maximum Hourly Emission Rate (lbs/hr): 1.02
 Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 2.81

MAGLC ($\mu\text{g}/\text{m}^3$): 4,486

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (waste organic liquids and solids), 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 Government Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxics Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for change.

IV. Reporting Requirements

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None.

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V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.