

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install **13-04075**

**A. Source Description**

Ritrama Duramark Inc. has submitted permit to install application to modify an Adhesive Coating line by adding an additional 20 feet to the line.

**B. Facility Emissions and Attainment Status**

The facility has Title V status due to their Potential to emit of more than 10 TPY for a single HAP and 25 Tons per Year of Combined HAPs as well as the potential to emit more than 100 TPY of VOC.

**C. Source Emissions**

This modified source has the potential to emit more than 10 TPY of a single HAP, 25 TPY of combined HAPs and 100 TPY of VOC resulting in Title V applicability. However, the company has requested a Federal Enforceable Permit to Install (Synthetic Minor) in order to avoid Title V status by restricting operating hours to 6000 hrs/yr therefore; giving them an allowable VOC limit of 78 TPY including cleanup and a facility wide limit of 9.9 TPY of individual HAP and 25 TPY of combined HAPs. This facility also has a casting line, (K004) pti # 13-3112 issued 12/5/96, which contributes to its emissions. This emission unit has a federally enforceable allowable VOC limit of 15.22 TPY and emits less than 1 TPY of HAP emissions. There was also a pilot coating line (K005) that was permanently shutdown as of April 2003.

**D. Conclusion**

Ritrama has chosen to limit their operating hours in order to stay below the 100 TPY threshold for VOC and the HAP thresholds. They have limited the HAP emission to a facility wide limit of 10 TPY for a single HAP and 25 TPY of combined HAPs in order to avoid Title V.



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
CUYAHOGA COUNTY  
Application No: 13-04075**

**CERTIFIED MAIL**

**DATE: 6/5/2003**

Ritrama Duramark  
Robert Hall  
341 Eddy Rd  
Cleveland, OH 441081601

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 of 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 **\$400** 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, 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 13-04075 FOR AN AIR CONTAMINANT SOURCE FOR  
RITRAMA DURAMARK**

On 6/5/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Ritrama Duramark**, located at **341 Eddy Rd, Cleveland, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04075:

**Oven extension to adhesive line no. 1 -- K003.**

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.

Mark Vilem, 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 13-04075**

Application Number: 13-04075  
APS Premise Number: 1318007355  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Ritrama Duramark  
Person to Contact: Robert Hall  
Address: 341 Eddy Rd  
Cleveland, OH 441081601

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**341 Eddy Rd  
Cleveland, Ohio**

Description of proposed emissions unit(s):  
**Oven extension to adhesive line no. 1 -- K003.**

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

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Director

**Ritrama Duramark**

**Facility ID: 1318007355**

**PTI Application: 13-04075**

**Issued: To be entered upon final issuance**

**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**

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

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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

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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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**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**

- 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).

**Ritrama Duramark**  
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**Facility ID: 1318007355**

Emissions Unit ID: **K003**

- 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.

#### **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>
VOC	78
<b>Individual HAPs (facility wide)</b>	<b>9.9</b>
<b>Combined HAPs (facility wide)</b>	<b>24.9</b>

**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>
<p>K003 - 20 foot oven extension on Adhesive coating line.</p> <p>Terms in this permit supercede those identified in PTI 13-03057 issued 12/5/96.</p>	<p>OAC rule 3745-31-05(A)(3)</p>	<p>Volatile Organic Compound (VOC) emissions from coating shall not exceed 24 lbs/hr and 72 tpy.</p> <p>VOC emissions from cleanup shall not exceed 6 TPY.</p>
<p>MODIFIED</p>	<p>OAC rule 3745-21-09(F)</p>	<p>See A.2.b</p>
	<p>OAC rule 3745-21-09(B)(6)</p>	<p>See A.2.c</p> <p>The capture and control requirements specified by this rule are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(A)(3).</p>
	<p>OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V</p>	<p>See Terms A.2.a, A.2.b, B.1. and B.2</p>

**2. Additional Terms and Conditions**

- 2.a 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 this facility shall not exceed 9.9 tons /year for any single HAP and 24.9 tons/year for any combination of HAPs facility wide. VOC emissions are restricted to 78 tons/year for K003. Compliance with the above limitations shall be based on a rolling, 12-month summation.

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- 2.b** The permittee shall provide a capture and control efficiency of no less than 95% and shall achieve a control efficiency of not less than 96% by weight to control emissions generated by the application of the coatings.
- 2.c** In lieu of complying with the pounds of VOC per gallon of solids limitation contained in OAC rule 3745-21-09(F), the permittee shall comply with the capture and control requirements established as BAT in A.2.b above.

**B. Operational Restrictions**

- 1. The maximum annual operating hours for this emissions unit shall not exceed 6000, based upon a rolling, 12-month summation of the operating hours. This operating hours restriction will limit the maximum single HAP emissions to 9.9 tons and combined HAP emissions to 24.9 tons facility wide, and the VOC emissions to 78 tons per rolling, 12-month period for K003.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	500
1 - 2	1000
1 - 3	1500
1 - 4	2000
1 - 5	2500
1 - 6	3000
1 - 7	3500
1 - 8	4000
1 - 9	4500
1 - 10	5000
1 - 11	5500
1 - 12	6000

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

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2. Maintain and operate a regenerative thermal oxidizer (RTO) as follows:
  - i. The permittee shall employ a capture system which shall capture not less than 99.6%, by weight, of all VOC emissions from this emission unit.
  - ii. The permittee shall employ a control system which shall destroy not less than 96%, by weight, of the VOC emission captured.
3. The average combustion temperature within the thermal incinerator, for any 3-hour block of time 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.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the number of hours of operation;
  - d. the number of gallons of each coating employed;
  - e. the daily VOC emission rate determined by summing (b xd) for each coating employed and then multiplying by (1 - the capture & control efficiency) from the most recent stack test which demonstrated compliance;
  - f. the average hourly emission rate, in pounds per hour, (e/c);
  - g. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - h. the total combined Hazardous Air Pollutant (HAP) content for each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from

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- b);
- i. the name and identification of each cleanup material employed;
  - j. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
  - k. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied; and
  - l. the number of gallons of each cleanup material employed.
2. The permittee shall maintain records of the total individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period. For each HAP, the sum of C.1.d times C.1.g for each coating multiplied by the capture and control efficiency from the most recent performance test which demonstrated compliance plus the sum of C.1.j times C.1.l for each cleanup material.
  3. The permittee shall maintain records of the total combined Hazardous Air Pollutant (HAP) emissions from all coatings and cleanup materials employed, in pounds or tons per month and

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pounds or tons per rolling, 12-month period. The combined HAP emissions shall be determined by the sum of C.1.d times C.1.h for each coating multiplied by (1 - the capture and control efficiency) from the most recent performance test which demonstrated compliance plus the sum of C.1.k times C.1.l for each cleanup material).

4. The permittee shall maintain records of the rolling, 12-month summation of VOC emissions determined by summing the daily emissions for coatings from C.1.e above and adding the emissions due to cleanup determined by summing C.1.b times C.1.l for all cleanup materials.
5. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) combustion temperature within the thermal oxidizer when the emission unit is in operation. Units shall be in degrees Fahrenheit. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modification deemed necessary by the permittee.

The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary the permittee.

6. The permittee shall collect and record the following information each day for the control equipment when this emissions unit is in operation:
  - a. A log of downtime time for the capture system, control device, and monitoring equipment, while the associated emissions unit was in operation.
  - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature within the thermal oxidizer, was 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
6. The permittee shall maintain monthly records of the following information:
  - a. The operating hours for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.

(i.e. rolling, 12 month summation of the operating hours).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.

7. The permit to install for this emissions unit (K003) 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 potentially 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-hour 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(s):

Pollutant: Toluene

TLV (ug/m<sup>3</sup>):188,000

Maximum Hourly Emission Rate (lbs/hr): 24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 83.3

MAGLC (ug/m<sup>3</sup>): 4,486

Pollutant: n-Hexane

TLV (ug/m<sup>3</sup>):176,000

Maximum Hourly Emission Rate (lbs/hr): 24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 81.4

MAGLC (ug/m<sup>3</sup>): 4,190

8. 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 (typically 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 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 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.

9. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still 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 the change.

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

1. The permittee shall submit quarterly summaries of the following records:
  - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emission limit.
  - b. All 3 - hour blocks of time when the emissions unit was in operation during which the average temperature within the thermal oxidizer does not comply with the temperature limitation specified above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

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**PTI A**  
**Issued**

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**Emissions Unit ID: K003**

2. The permittee shall submit deviation (excursion) reports to Cleveland Division of Air Quality of any monthly record showing any deviation from the following:
  - a. The total individual HAP emissions limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.
  - b. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12- month period.
  - c. Exceedances of the rolling, 12-month summation of the operating hours limitation and, for the first 12 calender months of operation upon the issuance of this permit, all exceedances of the maximum allowable cumulative hours limitations.

These reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted within 30 days after the deviation occurs.

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## **E. Testing Requirements**

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
Individual HAPs emissions shall not exceed 9.9 tpy facility wide based upon a rolling 12-month summation, and combination HAPs emission shall not exceed 24.9 tpy based upon a rolling, 12-month summation.  
  
Applicable Compliance Method:  
Compliance with the emissions limitations shall be determined pursuant to the record keeping requirements.
  - b. Emission Limitation:  
24 lbs/hr and 72 tpy VOC, based upon a rolling, 12-month summation, for coating application  
  
Applicable Compliance Method:  
Compliance shall be demonstrated by the record keeping requirements contained in section C of this permit.
  - c. Emission Limitation:  
6 TPY VOC from cleanup.  
  
Applicable Compliance Method:  
Compliance shall be demonstrated by the record keeping requirements contained in section C of this permit.
2. 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.

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- 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 USEPA's

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"Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Cleveland DAQ will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

- 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 Cleveland DAQ.
- e. 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 U.S.EPA Methods 25 or 25A of 40 CFR Part 60, Appendix A. Formulation data from the manufacturer, or if required Method 24A, shall be used to determine VOC contents of the coatings. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of the interfering gases; and
- f. In accordance with Engineering Guide #56, the results of the performance test shall be converted to pounds of VOC per hour by multiplying the reported pounds of organic carbon per hour (from Method 25 or 25A) by a ratio of 1.2 pounds of organic material per pound of carbon.

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.

**F. Miscellaneous Requirements**

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**Ritrama Duramark**  
**PTI A**  
**Issued**

**Facility ID: 1318007355**

Emissions Unit ID: **K003**

None.