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

Permit To Install **13-03951**

A. Source Description

The Sure-Foot Industries Corporation, is located at 20260 First Ave. in Cleveland, Cuyahoga County, Ohio. This facility is installing an adhesive coating line which applies adhesive backing for non-slip products.

B. Facility Emissions and Attainment Status

This new source has the potential to emit more than 40 tons of VOC emissions per year which includes hazardous air pollutant (HAP) emissions in excess of 10 tpy for any single HAP. However the company has requested a Federally Enforceable Permit to Install (Synthetic Minor) in order to avoid the MACT and Title V permitting requirements. Cuyahoga County is currently designated as attainment for ozone (1-hour average).

C. Source Emissions

The new adhesive coating line is classified as a paper web coating line and, therefore, is potentially subject to the Maximum Achieveable Control Technology (MACT) requirement in 40 CFR Part 63 Subpart JJJJ. In order to maintain area source status in regards to the MACT and comply with Ohio EPA regulations the company is installing a catalytic oxidizer for control of VOC and HAP emissions. To avoid the MACT and Title V major source designation, the facility is requesting that federally enforceable limits be placed on coating usage, limiting the usage to 22,500 gallons per year with a maximum hourly coating usage of 60 gallons per hour. The allowable emission limitation will be 5.95 TPY of VOC, which will also restrict single HAP emissions below the major source threshold of 10 tpy.

D. Conclusion

Limiting the usage rate to 22,500 gallons per rolling, 12-month period with a maximum hourly coating usage rate of 60 gallons per hour will reduce the HAP and VOC emissions below the Title V applicability thresholds of 10 tpy for any single HAP, 25 tpy for combined HAPs, and 100 tpy for VOC. The total VOC emisisons (including HAPs) will be limited to 5.95 tpy. Therefore, Surefoot Industries will not be subject to Title V or the MACT permitting 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: 13-03951

DATE: 6/11/2002

Sure Foot Industries Corporation
Raymond Buckley
20260 First Avenue
Cleveland, OH 44130

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 **$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,

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

CC: USEPA **CBAPC** **PA**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: To be entered upon final issuance**
Terms and Conditions **Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-03951

Application Number:	13-03951
APS Premise Number:	1318008340
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Sure Foot Industries Corporation
Person to Contact:	Raymond Buckley
Address:	20260 First Avenue Cleveland, OH 44130

Location of proposed air contaminant source(s) [emissions unit(s)]:
20260 First Avenue
Cleveland, Ohio

Description of proposed emissions unit(s):
Adhesive coating line -- K001.

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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.10 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.

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 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 <u>obtained before</u> 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 thirty (30) 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.

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 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 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 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

8. 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.

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

Pollutant	Tons Per Year
VOC	5.95

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	40 CFR 63 subpart JJJJ
K001 - Adhesive coating line equipped with a catalytic incinerator.	OAC rule 3745-31-05 (A)(3)	
	OAC rule 3745-31-05 (D) Synthetic Minor to Avoid Title V	
	OAC rule 3745-21-09(B)(6)	

Applicable Emissions Limitations/Control Measures

90% capture and 95% destruction, by weight, of VOC for all solvent based coatings.

VOC stack emissions shall not exceed
9.85 pounds per hour, including cleanup materials.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D) and 40 CFR 63 subpart JJJJ.

VOC stack emissions shall not exceed 1.85 tons per rolling, 12-month period, including cleanup materials.

VOC fugitive emissions shall not exceed 4.1 tons per rolling, 12-month period, including cleanup materials.

See A.2.a

The requirements of this rule are less stringent than the requirements of OAC rule 3745-31-05 (A)(3).

see A.2.a below.

2. Additional Terms and Conditions

2.a The permittee has requested a Synthetic Minor PTI limiting their coating usage to 22,500 gallons per year with a maximum hourly coating usage of 60 gallons per hour in order to avoid the MACT and Title V permitting requirements.

II. Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, 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. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The maximum annual coating usage for this emissions unit shall not exceed 22,500 gallons, based upon a rolling, 12 - month summation of the solvent usage figures.

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

Month(s) Cumulative Coating Usage	Maximum Allowable
1	1,875 gallons
2	3,750 gallons
3	5,625 gallons
4	7,500 gallons
5	9,375 gallons
6	11,250 gallons
7	13,125 gallons
8	15,000 gallons
9	16,875 gallons
10	18,750 gallons
11	20,625 gallons
12	22,500 gallons

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous monitors and recorder(s) which measure and record the temperature immediately upstream and down stream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. 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 by the permittee.

   The permittee shall collect and record the following information each day:

   a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

   b. All 3-hour blocks of time (when the emission unit is in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

   c. A log of the downtime for the capture (collection)system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall collect and record the following information each month for this emissions unit for the purpose of determining annual VOC emissions:

   a. The name and identification number of each coating, as applied;

   b. The VOC content of each coating, excluding water and exempt solvents, as applied, in pounds per gallon;

   c. The number of gallons of each coating employed, excluding water and exempt solvents;

   d. The total uncontrolled VOC emissions from all coatings, in pounds per month (b x c);

   e. The name and identification number of each cleanup material employed;

   f. The VOC content of each cleanup material, excluding water and exempt solvents, as applied, in pounds per gallon;

g. The number of gallons of each cleanup material employed;

h. The total uncontrolled VOC emissions from all cleanup materials, in pounds per month (f x g);

i. The total controlled VOC emission rate for all coatings and cleanup materials; in pounds or ton(s), calculated using the capture and destruction efficiencies determined from the most recent performance test that demonstrated the emissions unit was in compliance and the formula contained in Section A.V of these terms and conditions; and

j. The total fugitive VOC emission rate for all coatings and cleanup materials; in pounds or ton(s), calculated using the formula contained in Section A.V of these terms and conditions.

3. The permittee shall maintain monthly records of the following information:

a. The coating usage for each month.

b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the coating usage figures.

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emission unit was in operation during which the average temperature of the exhaust gases
immediately before the catalyst bed or the average temperature difference across the catalyst bed does not comply with the temperature limitations specified above. Each report shall be submitted within 30 days after deviation occurs.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly VOC limitation Each report shall be submitted within 30 days after the deviation occurs.

4. The permittee shall submit annual reports which specify the actual annual stack and fugitive VOC

emissions for this emissions unit. The reports shall be submitted by January 31 of each year and cover the previous calendar year.

V. Testing Requirements

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

   a. Emission Limitation:

   VOC stack emissions shall not exceed 9.85 pounds per hour, including cleanup materials.

   Applicable Compliance Method:

   Compliance shall be determined in accordance with the testing requirements in Section A.V.2 of these terms and conditions.

   b. Emission Limitation:

   VOC stack emissions shall not exceed 1.85 tons per rolling, 12-month period, including cleanup materials.

   Applicable Compliance Method:

   Compliance shall be demonstrated by the following calculation:

   VOC(stack) = [VOC(coatings) + VOC(cleanup)] x 0.90 x 0.05

   Where:

   VOC(stack) = annual VOC emissions from the stack associated with this emissions unit;

   VOC(coatings) = annual uncontrolled VOC emissions from all coatings calculated by summing the monthly VOC emissions calculated in Section A.III.2.d of these terms and conditions over a 12-month period;

   VOC(cleanup) = annual uncontrolled VOC emissions from all cleanup materials calculated by summing the monthly VOC emissions calculated in Section A.III.2.h of these terms and conditions over a 12-month period;

   0.90 = 90% capture of VOC emissions; and

   0.05 = 95% VOC control efficiency.

When the testing identified in Section A.V.2 of these terms and conditions is completed, values obtained for capture and control efficiencies shall be used in lieu of 0.90 and 0.05, respectively, to calculate annual VOC stack emissions.

c. Emission Limitation:

VOC fugitive emissions shall not exceed 4.1 tons per rolling, 12-month period, including cleanup emissions.

Applicable Compliance Method:

Compliance shall be demonstrated by the following calculation:

VOC(fugitive) = [VOC(coatings) + VOC(cleanup)] x 0.10

Where:

VOC(fugitive) = annual fugitive VOC emissions from this emissions unit;

VOC(coatings) = annual uncontrolled VOC emissions from all coatings calculated by summing the monthly VOC emissions calculated in Section A.III.2.d of these terms and conditions over a 12-month period;

VOC(cleanup) = annual uncontrolled VOC emissions from all cleanup materials calculated by summing the monthly VOC emissions calculated in Section A.III.2.h of these terms and conditions over a 12-month period; and

0.10 = 10% of VOC emissions not captured with 90% capture of VOC emissions by control device.

When the testing identified in Section A.V.2 of these terms and conditions is completed, the value obtained for capture efficiency shall be used in lieu of 0.10 to calculate annual VOC fugitive emissions.

d. Capture and Control Limitations

90% capture and 95% destruction of VOC, by weight, for all solvent based coatings.

Applicable Compliance Method:

40 CFR Part 60, Appendix A, Methods 25, 25A and 40 CFR Part 51, Appendix M,

Method 204. Performance testing shall be done in accordance with OAC rule 3745-21-10(C).

e. Per OAC rule 3745-21-04 (B)(1) and (B)(5) US EPA Method 24 or 24 (a) shall be used to determine the VOC contents of all the coatings and cleanup materials employed in this emissions unit.

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 3 months after startup and debugging of this emissions unit or 3 months after the effective date of this permit if this emissions unit is in production upon the effective date of this permit..

   b. The emission testing shall be conducted to demonstrate compliance with the hourly VOC emission limitation, and the capture efficiency limitation and destruction efficiency limitation for VOC of 90% and 95%, respectively. The emission testing shall also be conducted to establish the average temperature of the exhaust gases immediately before the catalyst bed and the average temperature difference across the catalyst bed.

   c. The following test methods shall be employed to demonstrate compliance with the capture efficiency, control efficiency, and emission limitations for VOC:

      i. Method 25 of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm, or Method 25 A of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are less than 50 ppm; and

      ii. Method 204 of 40 CFR Part 51, Appendix M, to determine capture efficiency.

      iii. Method 24 or 24 (a) of 40 CFR 60, Appendix A, to determine VOC contents of coatings and cleanup materials.

      Alternative US EPA-approved test methods may be used with prior approval from the Ohio EPA.

   d. Testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

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

   f. The control or destruction efficiency, defined as the percent reduction of mass emissions between the inlet and outlet of the control system, shall be determined in accordance with

the test methods and procedures specified in OAC rule 3745-21-10. 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 a consideration of the potential presence of interfering gases.

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

Personnel from the Cleveland Bureau of Air Pollution Control shall be permitted to witness the test(s), 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 emission unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland local air agency.

VI. Miscellaneous Requirements

None

Emissions Unit ID: **K001**

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Adhesive coating line equipped with a catalytic incinerator.	None	None

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 (K001) 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/m3):145,000 (50 ppm)
   Maximum Hourly Emission Rate (lbs/hr):21.09
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,563
   MAGLC (ug/m3): 3,452

Pollutant:Hexane
TLV (ug/m3): 176,000 (50 ppm)
Maximum Hourly Emission Rate (lbs/hr): 6.61
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 791.6
MAGLC (ug/m3): 4,190

2. Physical changes to or changes in the method of operation of the emissions unit after its installation 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 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.

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None