

Facility ID: 0819070018 Issuance type: Draft State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

[Go to Part II for Emissions Unit P014](#)

[Go to Part II for Emissions Unit P031](#)

[Go to Part II for Emissions Unit P038](#)

[Go to Part II for Emissions Unit P041](#)

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Facility ID: 0819070018 Emissions Unit ID: P014 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Sealing compound machine	OAC rule 3745-35-07	5.84 lbs/day methyl ethyl ketone (MEK); 0.70 TPY MEK, as a rolling, 12-month summation; less than or equal to 1 gallon/day (7.3 lbs) sealant usage; 240 gallons (1752 lbs) sealant usage, as a rolling, 12-month summation
	OAC rule 3745-21-09(U)(2)(e)	less stringent than the usage limit established above

2. Additional Terms and Conditions

None The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 19.5 TPY for any combination of HAPs, based upon rolling, 12-month summations.

B. Operational Restrictions

1. The maximum VOC content of all sealants employed in this emissions unit shall not exceed 5.84 lbs VOC/gallon.
2. The maximum MEK content of all sealants employed in this emissions unit shall not exceed 5.84 lbs MEK/gallon.
3. The maximum daily sealant usage shall not exceed 1 gallon (7.3 lbs).
4. The annual sealant usage shall not exceed 240 gallons (1752 lbs), as 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 sealant usage levels specified in the following table:

. Maximum Allowable Cumulative Month(s) Sealant Usage

- 1 20 gallons (146 lbs)
- 1 - 2 40 gallons (292 lbs)
- 1 - 3 60 gallons (438 lbs)
- 1 - 4 80 gallons (584 lbs)
- 1 - 5 100 gallons (730 lbs)
- 1 - 6 120 gallons (876 lbs)
- 1 - 7 140 gallons (1022 lbs)
- 1 - 8 160 gallons (1168 lbs)
- 1 - 9 180 gallons (1314 lbs)
- 1 - 10 200 gallons (1460 lbs)
- 1 - 11 220 gallons (1606 lbs)
- 1 - 12 240 gallons (1752 lbs)

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual sealant usage limitation based upon rolling, 12-month summations.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the sealant machine:
 - a. The name and identification of each sealant employed.
 - b. The volume, in gallons, of each sealant employed.
 - c. The total volume, in gallons, of all sealants employed.
 - d. The VOC and MEK content of each sealant, as applied, in pounds per gallon.
 - e. The MEK emissions, in pounds per day.
2. The permittee shall collect and record the following information each month for the sealant machine.
 - a. The total sealant usage for the month, in gallons.
 - b. The total MEK and combined HAPs emissions from all sealants employed, in tons.
 - c. During the first 12 calendar months following the issuance of this permit, the cumulative sealant usage for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the sealant usage figures.
 - d. During the first 12 calendar months following the issuance of this permit, the cumulative MEK and total combined HAPs emission rates for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the MEK and total combined HAPs emission rates.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. The daily MEK emission limitation.
 - b. The maximum daily sealant usage limitation.
 - c. The rolling, 12-month sealant usage limitation.
 - d. The rolling, 12-month MEK emission limitation.
 - e. For the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative sealant usage limitations.

These quarterly deviation (excursion) reports shall be submitted in accordance with paragraph 3 of the General Terms and Conditions.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of sealants with VOC and/or MEK contents greater than the above-specified limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall also submit annual reports which specify the following:
 - a. The total sealant usage.
 - b. The MEK emissions for this emissions unit.
 - c. The individual HAP emissions from the facility.
 - d. The total combined HAPs emissions from the facility.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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):

Emission Limitation -
5.84 lbs/day MEK

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.
Emission Limitation -
0.70 TPY MEK, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.
Emission Limitation -
1 gallon/day (7.3 lbs) sealant usage

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.
Emission Limitation -
240 gallons/year (1752 lbs) sealant usage, as a rolling, 12-month summation

Applicable Compliance Method -
 Compliance shall be based upon the record keeping as specified in C.2.
 Emission Limitation -
 5.84 lbs VOC/gallon sealant
 5.84 lbs MEK/gallon sealant

Applicable Compliance Method -
 Compliance shall be based upon the record keeping requirements specified in C.1. USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. The MEK content of each material employed shall be based upon formulation data.
 Emission Limitation -
 less than 10 TPY of any individual HAP from this facility as a rolling, 12-month summation

Applicable Compliance Method -
 Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the individual HAP emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.
 Emission Limitation -
 less than 19.5 TPY of total combined HAPs from this facility as a rolling, 12-month summation

Applicable Compliance Method -
 Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the total combined HAPs emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

F. Miscellaneous Requirements

1. Equivalent types of sealants are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this federally enforceable State operating permit and the data presented in the corresponding application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of sealant.
2. The terms and conditions in Sections A through F of this permit are federally enforceable limitations, pursuant to OAC rule 3745-35-07.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0819070018 Emissions Unit ID: P031 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Sealing compound machine No. 1	OAC rule 3745-31-05(A)(3) PTI 08-2195	1.0 lb/hour and 8.0 lbs/day volatile organic compounds (VOC);
	OAC rule 3745-35-07	1.0 TPY VOC, as a rolling, 12-month summation; 8.0 lbs/day methyl ethyl ketone (MEK);
		1.0 TPY MEK, as a rolling, 12-month summation; less than or equal to 1.37 gallons/day (10 lbs) sealant

usage;

342 gallons (2526 lbs) sealant usage, as a rolling, 12-month summation

OAC rule 3745-21-09(U)(2)(e)

less stringent than the usage limit established above

2. Additional Terms and Conditions

- (a) The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 19.5 TPY for any combination of HAPs, based upon rolling, 12-month summations.

B. Operational Restrictions

- 1. The maximum VOC content of all sealants employed in this emissions unit shall not exceed 5.84 lbs VOC/gallon.
- 2. The maximum MEK content of all sealants employed in this emissions unit shall not exceed 5.84 lbs MEK/gallon.
- 3. The maximum daily sealant usage shall not exceed 1.37 gallons (10 lbs).
- 4. The annual sealant usage shall not exceed 342 gallons (2497 lbs), as 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 sealant usage levels specified in the following table:

. Maximum Allowable Cumulative
Month(s) Sealant Usage

- 1 - 29 gallons (212 lbs)
- 1 - 2 57 gallons (416 lbs)
- 1 - 3 86 gallons (628 lbs)
- 1 - 4 114 gallons (832 lbs)
- 1 - 5 143 gallons (1044 lbs)
- 1 - 6 171 gallons (1248 lbs)
- 1 - 7 200 gallons (1460 lbs)
- 1 - 8 228 gallons (1664 lbs)
- 1 - 9 257 gallons (1876 lbs)
- 1 - 10 285 gallons (2081 lbs)
- 1 - 11 314 gallons (2292 lbs)
- 1 - 12 342 gallons (2497 lbs)

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual sealant usage limitation based upon rolling, 12-month summations.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for the sealant machine:
 - a. The name and identification of each sealant employed.
 - b. The volume, in gallons, of each sealant employed.
 - c. The total volume, in gallons, of all sealants employed.
 - d. The VOC and MEK content of each sealant, as applied, in pounds per gallon.
 - e. The VOC and MEK emissions, in pounds per day.
 - f. The total number of hours the emissions unit was in operation.
 - g. The average hourly VOC emission rate, i.e., (e)/(f), in pounds per hour.
- 2. The permittee shall collect and record the following information each month for the sealant machine.
 - a. The total sealant usage for the month, in gallons.
 - b. The total VOC, MEK, and total combined HAPs emissions from all sealants employed, in tons.
 - c. During the first 12 calendar months following the issuance of this permit, the cumulative sealant usage for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the sealant usage figures.
 - d. During the first 12 calendar months following the issuance of this permit, the cumulative VOC, MEK, and total combined HAPs emission rate for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the VOC, MEK, and total combined HAPs emission rates.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. The hourly VOC emission limitation.
 - b. The daily VOC and MEK emission limitations.
 - c. The maximum daily sealant usage limitation.
 - d. The rolling, 12-month sealant usage limitation.

e. The rolling, 12-month VOC and MEK emission limitation.

f. For the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative sealant usage limitations.

These quarterly deviation (excursion) reports shall be submitted in accordance with paragraph 3 of the General Terms and Conditions.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of sealants with VOC and/or MEK contents greater than the above-specified limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

3. The permittee shall also submit annual reports which specify the following:

- a. The total sealant usage.
- b. The VOC emissions for this emissions unit.
- c. The MEK emissions for this emissions unit.
- d. The individual HAP emissions from the facility.
- e. The total combined HAPs emissions from the facility.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

Emission Limitation -
1.0 lb/hour VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.
Emission Limitation -
8.0 lbs/day VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.
Emission Limitation -
1.0 TPY VOC, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.
Emission Limitation -
8.0 lbs/day MEK

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.
Emission Limitation -
1.0 TPY MEK, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.
Emission Limitation -
1.38 gallons/day (10 lbs) sealant usage

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.
Emission Limitation -
346 gallons/year (2526 lbs) sealant usage, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.
Emission Limitation -
5.86 lbs VOC/gallon sealant
5.86 lbs MEK/gallon sealant

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in C.1. USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. The MEK content of each material employed shall be based upon formulation data.
Emission Limitation -
less than 10 TPY of any individual HAP from this facility as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the individual HAP emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.
Emission Limitation -
less than 19.5 TPY of total combined HAPs from this facility as a rolling, 12-month summation

Applicable Compliance Method -
 Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the total combined HAPs emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

F. Miscellaneous Requirements

1. Equivalent types of sealants are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this federally enforceable State operating permit and the data presented in the corresponding application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of sealant.
2. The terms and conditions in Sections A through F of this permit are federally enforceable limitations, pursuant to OAC rule 3745-35-07.

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Facility ID: 0819070018 Emissions Unit ID: P038 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Sealing compound machine No. 2	OAC rule 3745-31-05(A)(3) PTI 08-1999 OAC rule 3745-35-07	3.2 lbs/hour volatile organic compounds (VOC); 1.46 TPY VOC, as a rolling, 12-month summation; 11.68 lbs/day methyl ethyl ketone (MEK); 1.46 TPY MEK, as a rolling, 12-month summation; less than or equal to 2 gallons/day (14.6 lbs) sealant usage; 500 gallons (3650 lbs) sealant usage, as a rolling, 12-month summation
	OAC rule 3745-21-09(U)(2)(e)	less stringent than the usage limit established above

2. **Additional Terms and Conditions**
 - (a) The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 19.5 TPY for any combination of HAPs, based upon rolling, 12-month summations.

B. Operational Restrictions

1. The maximum VOC content of all sealants employed in this emissions unit shall not exceed 5.84 lbs VOC/gallon.
2. The maximum MEK content of all sealants employed in this emissions unit shall not exceed 5.84 lbs MEK/gallon.
3. The maximum daily sealant usage shall not exceed 2 gallons (14.6 lbs).
4. The annual sealant usage shall not exceed 500 gallons (3650 lbs), as 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 sealant usage levels specified in the following table:

. Maximum Allowable Cumulative

Month(s) Sealant Usage

- 1 - 42 gallons (307 lbs)
- 1 - 2 83 gallons (606 lbs)
- 1 - 3 125 gallons (912 lbs)
- 1 - 4 167 gallons (1219 lbs)
- 1 - 5 208 gallons (1518 lbs)
- 1 - 6 250 gallons (1825 lbs)
- 1 - 7 292 gallons (2132 lbs)
- 1 - 8 333 gallons (2431 lbs)
- 1 - 9 375 gallons (2738 lbs)
- 1 - 10 417 gallons (3044 lbs)
- 1 - 11 458 gallons (3343 lbs)
- 1 - 12 500 gallons (3650 lbs)

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual sealant usage limitation based upon rolling, 12-month summations.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the sealant machine:
 - a. The name and identification of each sealant employed.
 - b. The volume, in gallons, of each sealant employed.
 - c. The total volume, in gallons, of all sealants employed.
 - d. The VOC and MEK content of each sealant, as applied, in pounds per gallon.
 - e. The VOC and MEK emissions, in pounds per day.
 - f. The total number of hours the emissions unit was in operation.
 - g. The average hourly VOC emission rate, i.e., (e)/(f), in pounds per hour.
2. The permittee shall collect and record the following information each month for the sealant machine.
 - a. The total sealant usage for the month, in gallons.
 - b. The total VOC, MEK, and total combined HAPs emissions from all sealants employed, in tons.
 - c. During the first 12 calendar months following the issuance of this permit, the cumulative sealant usage for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the sealant usage figures.
 - d. During the first 12 calendar months following the issuance of this permit, the cumulative VOC, MEK, and total combined HAPs emission rates for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the VOC, MEK, and total combined HAPs emission rates.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. The hourly VOC emission limitation.
 - b. The daily MEK emission limitation.
 - c. The maximum daily sealant usage limitation.
 - d. The rolling, 12-month sealant usage limitation.
 - e. The rolling, 12-month VOC and MEK emission limitations.
 - f. For the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative sealant usage limitations.

These quarterly deviation (excursion) reports shall be submitted in accordance with paragraph 3 of the General Terms and Conditions.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of sealants with VOC and/or MEK contents greater than the above-specified limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall also submit annual reports which specify the following:
 - a. The total sealant usage.
 - b. The VOC emissions for this emissions unit.
 - c. The MEK emissions for this emissions unit.
 - d. The individual HAP emissions from the facility.
 - e. The total combined HAPs emissions from the facility.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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):
 - Emission Limitation -
3.2 lb/hour VOC

 - Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.
Emission Limitation -
1.46 TPY MEK, as a rolling, 12-month summation

 - Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.
Emission Limitation -
11.68 lbs/day MEK

 - Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.
Emission Limitation -
1.46 TPY MEK, as a rolling, 12-month summation

 - Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.
Emission Limitation -
2 gallons/day (14.6 lbs) sealant usage

 - Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.
Emission Limitation -
500 gallons/year (3650 lbs) sealant usage, as a rolling, 12-month summation

 - Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.
Emission Limitation -
5.84 lbs VOC/gallon sealant
5.84 lbs MEK/gallon sealant

 - Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in C.1. USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. The MEK content of each material employed shall be based upon formulation data.
Emission Limitation -
less than 10 TPY of any individual HAP from this facility as a rolling, 12-month summation

 - Applicable Compliance Method -
Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the individual HAP emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.
Emission Limitation -
less than 19.5 TPY of total combined HAPs from this facility as a rolling, 12-month summation

 - Applicable Compliance Method -
Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the total combined HAPs emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

F. Miscellaneous Requirements

1. Equivalent types of sealants are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this federally enforceable State operating permit and the data presented in the corresponding application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of sealant.
2. The terms and conditions in Sections A through F of this permit are federally enforceable limitations, pursuant to OAC rule 3745-35-07.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0819070018 Emissions Unit ID: P041 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with

ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Sealing compound machine No. 6	OAC rule 3745-31-05(A)(3) PTI 08-2426	1.27 lbs/hour, 27.94 lbs/day volatile organic compounds (VOC);
		3.5 TPY VOC, as a rolling, 12-month summation;
	OAC rule 3745-35-07	27.94 lbs/day methyl ethyl ketone (MEK);
		3.5 TPY MEK, as a rolling, 12-month summation;
		less than or equal to 4.78 gallons/day (35 lbs) sealant usage;
		1199 gallons (8753 lbs) sealant usage, as a rolling, 12-month summation
	OAC rule 3745-21-09(U)(2)(e)	less stringent than the usage limit established above

2. Additional Terms and Conditions

- (a) The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 19.5 TPY for any combination of HAPs, based upon rolling, 12-month summations.

B. Operational Restrictions

1. The maximum VOC content of all sealants employed in this emissions unit shall not exceed 5.84 lbs VOC/gallon.
2. The maximum MEK content of all sealants employed in this emissions unit shall not exceed 5.84 lbs MEK/gallon.
3. The maximum daily sealant usage shall not exceed 4.78 gallons (35 lbs).
4. The annual sealant usage shall not exceed 1199 gallons (8753 lbs), as 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 sealant usage levels specified in the following table:

. Maximum Allowable Cumulative
Month(s) Sealant Usage

- 1 - 100 gallons (730 lbs)
- 1 - 2 200 gallons (1460 lbs)
- 1 - 3 300 gallons (2190 lbs)
- 1 - 4 400 gallons (2920 lbs)
- 1 - 5 500 gallons (3650 lbs)
- 1 - 6 600 gallons (4380 lbs)
- 1 - 7 699 gallons (5103 lbs)
- 1 - 8 799 gallons (5833 lbs)
- 1 - 9 899 gallons (6563 lbs)
- 1 - 10 999 gallons (7293 lbs)
- 1 - 11 1099 gallons (8023 lbs)
- 1 - 12 1199 gallons (8753 lbs)

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual sealant usage limitation based upon rolling, 12-month summations.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the sealant machine:
 - a. The name and identification of each sealant employed.
 - b. The volume, in gallons, of each sealant employed.
 - c. The total volume, in gallons, of all sealants employed.
 - d. The VOC and MEK content of each sealant, as applied, in pounds per gallon.
 - e. The VOC and MEK emissions, in pounds per day.

- f. The total number of hours the emissions unit was in operation.
 - g. The average hourly VOC emission rate, i.e., (e)/(f), in pounds per hour.
2. The permittee shall collect and record the following information each month for the sealant machine.
- a. The total sealant usage for the month, in gallons.
 - b. The total VOC, MEK, and total combined HAPs emissions from all sealants employed, in tons.
 - c. During the first 12 calendar months following the issuance of this permit, the cumulative sealant usage for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the sealant usage figures.
 - d. During the first 12 calendar months following the issuance of this permit, the cumulative VOC, MEK, and total combined HAPs emission rates for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the VOC, MEK, and total combined HAPs emission rates.
- D. Reporting Requirements**
1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
- a. The hourly VOC emission limitation.
 - b. The daily VOC and MEK emission limitations.
 - c. The maximum daily sealant usage limitation.
 - d. The rolling, 12-month sealant usage limitation.
 - e. The rolling, 12-month VOC and MEK emission limitations.
 - f. For the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative sealant usage limitations.
- These quarterly deviation (excursion) reports shall be submitted in accordance with paragraph 3 of the General Terms and Conditions.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of sealants with VOC and/or MEK contents greater than the above-specified limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall also submit annual reports which specify the following:
- a. The total sealant usage.
 - b. The VOC emissions for this emissions unit.
 - c. The MEK emissions for this emissions unit.
 - d. The individual HAP emissions from the facility.
 - e. The total combined HAPs emissions from the facility.
- These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- 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):
- Emission Limitation -
1.27 lbs/hour VOC
- Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.
Emission Limitation -
27.94 lbs/day VOC
- Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.
Emission Limitation -
3.5 TPY VOC, as a rolling, 12-month summation
- Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.
Emission Limitation -
27.94 lbs/day MEK
- Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.
Emission Limitation -
3.5 TPY MEK, as a rolling, 12-month summation
- Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.

Emission Limitation -

4.78 gallons/day (35 lbs) sealant usage

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1.

Emission Limitation -

1199 gallons/year (8753 lbs) sealant usage, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.2.

Emission Limitation -

5.84 lbs VOC/gallon sealant

5.84 lbs MEK/gallon sealant

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in C.1. USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. The MEK content of each material employed shall be based upon formulation data.

Emission Limitation -

less than 10 TPY of any individual HAP from this facility as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the individual HAP emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

Emission Limitation -

less than 19.5 TPY of total combined HAPs from this facility as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the total combined HAPs emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

F. Miscellaneous Requirements

1. Equivalent types of sealants are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this federally enforceable State operating permit and the data presented in the corresponding application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of sealant.
2. The terms and conditions in Sections A through F of this permit are federally enforceable limitations, pursuant to OAC rule 3745-35-07.