



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**Application No:** 13-04689

**Fac ID:** 1318558216

**DATE:** 5/22/2007

Momentive Performance Materials Quartz  
James Maskil  
22557 West Lunn Road  
Cleveland, OH 44101-4924

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, 43216-1049.

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

CLAA

PA

**CUYAHOGA COUNTY**

PUBLIC NOTICE  
ISSUANCE OF DRAFT PERMIT TO INSTALL **13-04689** FOR AN AIR CONTAMINANT SOURCE  
FOR **Momentive Performance Materials Quartz**

On 5/22/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Momentive Performance Materials Quartz**, located at **22557 West Lunn Road, Strongsville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04689:

**Vortec Mill No. 2 -- P038**

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

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



**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 13-04689**

Application Number: 13-04689  
Facility ID: 1318558216  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Momentive Performance Materials Quartz  
Person to Contact: James Maskil  
Address: 22557 West Lunn Road  
Cleveland, OH 44101-4924

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**22557 West Lunn Road  
Strongsville, Ohio**

Description of proposed emissions unit(s):  
**Vortec Mill No. 2 -- P038**

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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Chris Korleski  
Director

**Momentive Performance Materials Quartz**  
**PTI Application: 13-04689**  
**Issued: To be entered upon final issuance**  
**Part I - GENERAL TERMS AND CONDITIONS**

**Facility ID: 1318558216**

**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 (i.e., postmarked) quarterly 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,

**Momentive Performance Materials Quartz**

**Facility ID: 1318558216**

**PTI Application: 13-04689**

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**Momentive Performance Materials Quartz**  
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## **9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

## **10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

## **11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate 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

**Momentive Performance Materials Quartz**

**Facility ID: 1318558216**

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**Momentive Performance Materials Quartz**

**Facility ID: 1318558216**

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**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**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><b>Pollutant</b></u>	<u><b>Tons Per Year</b></u>
PM/PM <sub>10</sub>	2.7

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**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.

**Operations, Property, and/or Equipment - (P038) - Vortec Mill # 2**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-07(A)(1)(a)	Visible particulate emissions shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.
OAC rule 3745-17-11(A)(2)	The emission limitation specified by this rule is equivalent to or less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(C).
OAC rule 3745-31-05(C)	0.62 lb/hr and 2.7 tons/year of PE/PM <sub>10</sub> emissions. (See A.2.a.)

**2. Additional Terms and Conditions**

- 2.a Permit to Install 13-04689 for this air contaminant source takes into account the use of a baghouse system, whenever this air contaminant source is in operation, with a minimum control efficiency of 95%, by weight for PE. This is a voluntary restriction as proposed by the permittee for the purpose of establishing federally enforceable limits that are more stringent than OAC rule 3745-17-11(A)(2).

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The permittee

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shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

2. Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation; the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.
3. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the records of the following information for each corrective action taken; a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.
4. The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications of 0.5 to 6.0 inches of water.
5. This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland DAQ. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emission unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

**D. Reporting Requirements**

1. The permittee shall submit quarterly reports to the Cleveland Division of Air Quality (Cleveland DAQ) that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

Emissions Unit ID: **P038**

- a. each period of time when the pressure drop across the baghouse was outside of the range specified by the manufacturer;
- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall notify the Cleveland DAQ in writing of any record showing that the emissions unit was in operation and the baghouse was not operating. This notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days after the event occurs.

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
Visible particulate emissions from any stack servicing this emissions unit shall not exceed 20% opacity, as a six-minute average, except as provided by rule.  
  
Applicable Compliance Method:  
If required by Ohio EPA or Cleveland DAQ, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using methods and procedures specified in U.S. EPA Reference Method 9.
  - b. Emission Limitation:  
0.62 lb/hour of PE/PM<sub>10</sub> emissions  
  
Applicable Compliance Method:

Emissions Unit ID: **P038**

Compliance may be based upon the use of the following equation:

$$E = UE \times (1 - CE)$$

where

E = emission rate in lb/hr

UE = Uncontrolled emission rate in lb/hr \*

CE = % efficiency of the control equipment \*

\* Determined from mass-balance analysis or from the most recent stack test that demonstrated compliance.

UE = 12.25 lbs/hr (from permittee's mass-balance analysis)

CE = 0.95 (control equipment efficiency 95% per engineering estimate)

If required by Ohio EPA or Cleveland DAQ, compliance shall be determined by performing a stack test using Methods 1-5 of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

2.7 tons/year PE/PM<sub>10</sub>

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

## **F. Miscellaneous Requirements**

1. The following terms and conditions in Part II are federally enforceable: A, B, C, D, and E.

**Momentive Performance Materials Quartz**  
**PTI Application: 13-04689**  
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**Facility ID: 1318558216**

Emissions Unit ID: **P038**

SIC CODE 3297 SCC CODE \_\_\_\_\_ EMISSIONS UNIT ID P038

EMISSIONS UNIT DESCRIPTION Vortec Mill No. 2

DATE INSTALLED \_\_\_\_\_

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>	Non-Attainment	0.613 lb/hr	2.68	0.62 lb/hr	2.7 tons
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Enter Determination** BAT does not apply. The source has less than 10 TPY controlled emissions. The limitations set in this permit was requested by the facility.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_