

Facility ID: 0857173091 Issuance type: Final 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.

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Facility ID: 0857173091 Emissions Unit ID: P001 Issuance type: Final 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>
300 gallon process mix tank with inline condenser; 600 gallon holding tank; dryers with inline condensers; solvent distillation unit; micro-encapsulation process	OAC rule 3745-31-05 PTI 08-3523	The total combined emissions for P001 and P002 shall not exceed 192 lbs OC/day, 2.83 tons OC/month, and 34.4 TPY OC.
	OAC rule 3745-21-07(G)	exempt, see B.1. below.

### 2. Additional Terms and Conditions

- (a) None

### B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The average temperature of the inline condenser, for any 3-hour block of operating time, shall not be more than 6 degrees Celsius (11 degrees Fahrenheit) above the average temperature during the most recent emission test that demonstrated the emission unit was in compliance. Until additional testing is conducted, the average temperature of the inline condenser, for any 3-hour block of operating time, shall be less than 45 degrees Celsius (113 degrees Fahrenheit).

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information, each month, for emissions units P001 and P002 combined:
  - a. the company identification for each solvent employed;
  - b. documentation on whether or not each solvent is a photochemically reactive material;
  - c. the number of gallons of each solvent employed;
  - d. the number of gallons of each solvent shipped as hazardous waste;
  - e. the number of gallons of each solvent reclaimed through the recovery system;
  - f. the organic compound content of each solvent employed, in pounds per gallon;
  - g. the organic compound usage rate for each solvent employed, in pounds per month, i.e., (c) \* (f);
  - h. the total organic compound usage rate for all solvents employed, in pounds per month;
  - i. the amount of organic compounds, in pounds, for each solvent shipped as hazardous waste, i.e., (d) \* (f);
  - j. the total amount of organic compounds for all solvents shipped as hazardous waste, in pounds per month;
  - k. the amount of organic compounds, in pounds, for each solvent reclaimed, i.e., (e) \* (f);

- I. the total amount of organic compounds for all solvents reclaimed, in pounds per month;
  - m. the total organic compound emission rate in pounds per month, i.e., (h) - (j) - (l);
  - n. the total number of days the the emissions unit was in operation during the month; and
  - o. the average daily organic compound emission rate for all solvents, i.e., (m)/(n), in pounds per day (average).
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the inline condenser when emissions unit P001 is in operation. The temperature units shall be in degrees Celsius. The monitoring and recordkeeping devices shall be capable of accurately measuring the desired parameters. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. the average temperature of the inline condenser during each of the 3-hour blocks of operating time during the day; and
- b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

**D. Reporting Requirements**

1. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports for the combined emissions units P001 and P002. The report shall include:
  - a. an identification of each month during which the total organic compound emission rate exceeded the pounds per day limit of this permit, and the average organic compound emission rate for each such month.
  - b. an identification of each month during which the total organic compound emission rate exceeded the tons per month limit of this permit, and the actual organic compound emission rate for each such month.
2. The permittee shall submit temperature deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency), that identify all 3-hour blocks of operating time during which the average temperature of the inline condenser exceeded the temperature limitation specified above.
3. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the deviation.

**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-  
192 lbs OC/day

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C.1.  
Emission Limitation-  
2.83 tons OC/month

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C.1.  
Emission Limitation-  
34.4 TPY OC

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C.1., and shall be the sum of the monthly OC emission rates for the calendar year.
2. Within 12 months after the issuance of the permit, the permittee shall conduct or have conducted performance testing on the air contaminant emissions unit(s) in order to demonstrate compliance with the allowable organic compounds mass emissions limitation and the requirements of the inline condenser. The test(s) shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases. The test(s) shall be conducted while the emissions unit is in operation at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 

Use of the analytical methods not specified in OAC rule 3745-21-10 shall be approved by Administrator on a case-by-case basis. The permittee shall submit sufficient documentation for the Administrator to determine if an adaptation of the reference method or use of an alternative method is appropriate.

Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emissions test(s). Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to assure that the emissions unit operation and procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

**F. Miscellaneous Requirements**

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

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Facility ID: 0857173091 Emissions Unit ID: P002 Issuance type: Final 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>
research and development dryer	OAC rule 3745-31-05 PTI 08-3523	The total combined emissions for P001 and P002 shall not exceed 192 lbs OC/day, 2.83 tons OC/month, and 34.4 TPY OC.
	OAC rule 3745-21-07(G)	See B.1. below

2. **Additional Terms and Conditions**
  - (a) None

**B. Operational Restrictions**

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The average temperature of the inline condenser, for any 3-hour block of operating time, shall not be more than 6 degrees Celsius (11 degrees Fahrenheit) above the average temperature during the most recent emission test that demonstrated the emission unit was in compliance. Until additional testing is conducted, the average temperature of the inline condenser, for any 3-hour block of operating time, shall be less than 45 degrees Celsius (113 degrees Fahrenheit).

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

1. The permittee shall collect and record the following information, each month, for emissions units P001 and P002 combined:
  - a. the company identification for each solvent material employed;
  - b. documentation on whether or not each solvent material is a photochemically reactive material;
  - c. the number of gallons of each solvent employed;
  - d. the number of gallons of each solvent shipped as hazardous waste;
  - e. the number of gallons of each solvent reclaimed through the recovery system;
  - f. the organic compound content of each solvent material employed, in pounds per gallon;
  - g. the organic compound usage rate for each solvent material employed, in pounds per month, i.e., (c) \* (f);
  - h. the total organic compound usage rate for all solvents, in pounds per month;
  - i. the organic compounds, in pounds, for each solvent shipped as hazardous waste, i.e. (d) \* (f);
  - j. the total organic compounds for all solvent materials shipped as hazardous waste, in pounds per month;
  - k. the organic compounds, in pounds, for each solvent reclaimed, i.e., (e) \* (f);

- l. the total organic compounds for all solvents reclaimed, in pounds per month;
  - m. the total organic compound emission rate in pounds per month, i.e., (h) - (j) - (l);
  - n. the total number of days the the emissions unit was in operation during the month;
  - o. the average daily organic compound emission rate for all solvents, i.e., (m)/(n), in pounds per day (average).
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the inline condenser when emissions unit P002 is in operation. The temperature units shall be in degrees Celsius. The monitoring and recordkeeping devices shall be capable of accurately measuring the desired parameters. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- The permittee shall collect and record the following information each day:
- a. the average temperature of the inline condenser during each of the 3-hour blocks of operating time during the day; and
  - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- D. Reporting Requirements**
- 1. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports for the combined emissions units P001 and P002. The report shall include:
    - a. an identification of each day during which the total organic compound emission rate exceeded the pounds per day limits of this permit, and the average organic compound emission rate for each such day.
    - b. an identification of each month during which the total organic compound emission rate exceeded the tons per month limits of this permit, and the actual organic compound emission rate for each such month.
  - 2. The permittee shall submit temperature deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days, that identify all 3-hour blocks of operating time during which the average temperature of the inline condenser exceeded the temperature limitation specified above.
  - 3. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the deviation.
- 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-  
192 lbs OC/day
    - Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C.1.
    - Emission Limitation-  
2.83 ton OC/month
    - Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C.1.
    - Emission Limitation-  
34.4 TPY OC
    - Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section C.1., and shall be the sum of the monthly organic compound emission rates for the calendar year.
- F. Miscellaneous Requirements**
- 1. The permittee is hereby notified that this permit, and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.