

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.

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

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>
P001 - 300-gallon process mix tank, equipped with an in-line condenser and dryer	OAC rule 3745-31-05(A)(3) PTI # 08-04563	The organic compound (OC) emissions from this emissions unit shall not exceed 0.15 lb/hr, excluding cleanup, 5.57 lbs/day, and 1.02 TPY, including cleanup
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3)

2. **Additional Terms and Conditions**
  - (a) The hourly emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

**B. Operational Restrictions**

1. The average temperature of the inline condenser, for any 3-hour block of operating time, shall not be more than 35 degrees Celsius (95 degrees Fahrenheit).

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

1. The permittee shall collect and record the following information, each month, for this emissions unit:
  - a. the company identification for each solvent and cleanup material employed;
  - b. the number of pounds of each solvent and cleanup material employed for each batch;
  - c. the total number of batches for each month;
  - d. the OC emission rate for each solvent and cleanup material employed, in pounds per month, i.e. (b)\*(c)\*(0.012), including the 1.2% loss;
  - e. the total number of days that a batch was run per month; and
  - f. the average daily OC emission rate for each solvent and cleanup material employed, in pounds per day (average), i.e. (d)/(e).
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the inline condenser temperature, in degrees Fahrenheit, during each 3-hour block. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The monitoring devices shall be capable of accurately measuring the desired parameter.
3. The permittee shall collect and record the following information:
  - a. The permittee shall record the average temperature of the inline condenser during each of the three-hour blocks of operating time each day.
  - b. A log or record of operating time for the inline condenser and the associated emissions unit each day.

4. The permit to install for this emissions unit [P001] was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methanol

TLV (mg/m<sup>3</sup>): 262.08

Maximum Hourly Emission Rate (g/s): 0.0585

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 59.13

MAGLC (ug/m<sup>3</sup>): 6,240

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).
5. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General terms and Conditions of this permit, that include the following information:
  - a. An identification of each month during which the average daily OC emission rate exceeded 5.57 pounds per day, including cleanup.
  - b. all exceedances of the 3-hour blocks of operating time during which the average temperature of the in line condenser exceeded the temperature limitation specified above.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these Terms & Conditions shall be determined in accordance with the following method(s):  
Emission Limitation -

0.15 lb OC/hour, excluding cleanup

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum amount of organic compound material employed during a 24 hour reaction time of 300 lbs by the % loss factor (0.012) and dividing by 24 hr/day.

If required, compliance with the hourly allowable OC emission limitation above shall determined in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitation -

5.57 lbs OC/day, including cleanup

Compliance with the daily allowable OC emission limitation shall be determined based upon the record keeping

requirements specified in section C.1 of this permit.

Emission Limitation -

1.02 TPY OC, including cleanup

As long as compliance with the daily emission limitation is maintained, compliance with the annual emission limitation shall be assumed (the annual limitation was determined by multiplying the daily limitation by 365 days/day, and then dividing by 2000 lbs/ton).

F. **Miscellaneous Requirements**

1. None