Facility ID: 0857823102 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: 0857823102 Emissions Unit ID: P006 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P006 - Laminating machine, Sy-014	OAC rule 3745-31-05(A)(3) PTI # 08-04443	69.05 lbs/day and 12.6 TPY of organic compound (OC) emissions. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07 (G)(9)(f) and 3745-35-07(B).
	OAC rule 3745-21-07(G)(9)(f)	Reference B.1.
	OAC rule 3745-35-07(B)	Facility-wide emissions of any individual HAP shall not exceed 9.9 TPY, based upon a rolling 365-day summation of the daily individual HAP emissions. Facility-wide emissions of combined HAPs shall not exceed 24.9 TPY, based upon a rolling 365-day summation of the daily combined HAP emissions.

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. Prior to employing any photochemically reactive material(s), the permittee shall provide written notification to , and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

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

1. The permittee shall collect and record the following information for each day for this emissions unit:

   a. The company name and identification for each organic coating employed.

   b. The number of gallons of each organic coating material employed

   c. The OC content of each organic coating material employed, as applied.

   d. The daily OC emissions, determined by adding the product of (b) times (c) for each organic coating material employed, in pounds/day.

   e. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each organic coating material employed, in pounds of individual HAP per gallon of coating, as applied.

   f. The total combined HAP content of each organic coating material in pounds of combined HAPs per gallon, as

applied (the sum of all the individual HAP contents from (e)).

g. The total individual HAP emissions for each HAP from all organic coating materials employed, in pounds or tons per day (for each HAP, the sum of (e) times (b) for each coating material).

h. The total combined HAP emissions from all organic coating materials employed, in pounds or tons per day (the sum of (f) times (b) for each organic coating material).

i. The rolling, 365-day summation of the total individual facility-wide HAP emissions for each HAP from all organic coating materials employed, in tons per year.

j. The rolling, 365-day summation of the total combined facility-wide HAP emissions from all organic coating materials employed, in tons per year.

* A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a line-by-line basis.

2. The permit to install for this emissions unit (P006) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Cyclohexanone

TLV (ug/m3): 100,000

Maximum hourly Emission Rate (lbs/hour): 8 lb/hr

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3):1621

MAGLC (ug/m3): 2,381

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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook
entitled "2002 TLVs and BEIs," by the American Conference of Governmental Industrial Hygienists (ACGIH), than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information in accordance with Section A.2. of the General Terms and Conditions:

a. An identification of each day during which the organic compound emissions exceeded 69.05 lbs/day and the actual organic compound emissions for each such day.

b. Exceedances of the rolling, 365-day facility-wide individual HAP limitation.

c. Exceedances of the rolling, 365-day facility-wide combined HAP limitation.

2. The quarterly deviation (excursion) reports shall be submitted as specified in section A.2. of the General Terms and Conditions.

3. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) which specify the individual HAP emissions from the facility, the combined HAP emissions from the facility and the total OC emissions from the facility for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. **Testing Requirements**

1. Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation-
69.05 lbs/day OC

Applicable Compliance Method-
Compliance with the daily organic compound emission limitation shall be based upon the record keeping requirements contained in Section C.1. of this permit.
Emission Limitation-
12.6 TPY OC

Applicable Compliance Method-
Compliance with the annual organic compound emissions limitation shall be based upon the record keeping requirements as specified in section C.1. and shall be the sum of the 365 daily emission rates for the calendar year divided by 2000 lbs/ton.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings and cleanup materials

F. **Miscellaneous Requirements**

1. The terms and conditions in sections A, B, C, D and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.