Ohio Environmental Protection Agency

**John R. Kasich**, Governor
**Mary Taylor**, Lt. Governor
**Craig W. Butler**, Director

9/1/2015

Certified Mail

| | |
|---|---|
| Yes | TOXIC REVIEW |
| Yes | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| No | MACT/GACT |
| No | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MODELING SUBMITTED |
| Yes | SYNTHETIC MINOR TO AVOID TITLE V |
| Yes | FEDERALLY ENFORCABLE PTIO (FEPTIO) |
| No | SYNTHETIC MINOR TO AVOID MAJOR GHG |

Mr. Donald Popp
The Ruscoe Company, Plant II
219 East Miller Avenue
Akron, OH 44301-1326

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677010204
Permit Number: P0118712
Permit Type: Renewal
County: Summit

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

**How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

**How to give us feedback on your permitting experience**

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

**How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: ARAQMD

# Response to Comments

| | |
|---|---|
| Facility ID: | 1677010204 |
| Facility Name: | The Ruscoe Company, Plant II |
| Facility Description: | Mixing/Blending of Adhesives and Sealants |
| Facility Address: | 219 E. Miller Avenue<br>Akron, OH 44301<br>Summit County |
| Permit: | P0118712, Permit-To-Install and Operate - Renewal |
| A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Akron Beacon Journal on 07/10/2015. The comment period ended on 08/09/2015. | |
| Hearing date (if held) | |
| Hearing Public Notice Date (if different from draft public notice) | |

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

**1. Topic: None**

a. Comment: 15 minor changes suggested to correct formatting and typos.

b. Response: changes incorporated in Final Permit.

# FINAL

# Division of Air Pollution Control
# Permit-to-Install and Operate
for
The Ruscoe Company, Plant II

| | |
|---|---|
| Facility ID: | 1677010204 |
| Permit Number: | P0118712 |
| Permit Type: | Renewal |
| Issued: | 9/1/2015 |
| Effective: | 9/1/2015 |
| Expiration: | 9/1/2020 |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Permit-to-Install and Operate**
for
The Ruscoe Company, Plant II

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# Authorization

| | |
|---|---|
| Facility ID: | 1677010204 |
| Application Number(s): | A0053083 |
| Permit Number: | P0118712 |
| Permit Description: | FEPTIO renewal for 24 sealant/adhesive mixers. |
| Permit Type: | Renewal |
| Permit Fee: | $0.00 |
| Issue Date: | 9/1/2015 |
| Effective Date: | 9/1/2015 |
| Expiration Date: | 9/1/2020 |

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

The Ruscoe Company, Plant II
219 E. Miller Avenue
Akron, OH 44301

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

# Authorization (continued)

Permit Number: P0118712
Permit Description: FEPTIO renewal for 24 sealant/adhesive mixers.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

**Group Name: VOC Controlled Units**

| | |
|---|---|
| **Emissions Unit ID:** | **P025** |
| Company Equipment ID: | Coat 13 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P026** |
| Company Equipment ID: | Coat 14 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P028** |
| Company Equipment ID: | Coat 16 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P030** |
| Company Equipment ID: | Coat 18 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P031** |
| Company Equipment ID: | Coat 19 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P032** |
| Company Equipment ID: | Coat 20 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P033** |
| Company Equipment ID: | Coat 21 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P034** |
| Company Equipment ID: | Coat 22 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P035** |
| Company Equipment ID: | Coat 23 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P036** |
| Company Equipment ID: | Coat 24 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |

**Group Name: VOC Uncontrolled Units**

| | |
|---|---|
| **Emissions Unit ID:** | **P017** |

| | |
|---|---|
| Company Equipment ID: | Coat 02 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P018** |
| Company Equipment ID: | Coat 04 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P019** |
| Company Equipment ID: | Coat 07 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P020** |
| Company Equipment ID: | Coat 08 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P021** |
| Company Equipment ID: | Coat 09 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P022** |
| Company Equipment ID: | Coat 10 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P023** |
| Company Equipment ID: | Coat 11 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P027** |
| Company Equipment ID: | Coat 15 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P037** |
| Company Equipment ID: | Coat 25 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P038** |
| Company Equipment ID: | Pack 29 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P039** |
| Company Equipment ID: | Coat 30 |
| Superseded Permit Number: | P0106153 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P041** |
| Company Equipment ID: | Coat 03 |
| Superseded Permit Number: | |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P042** |
| Company Equipment ID: | Coat 05 |
| Superseded Permit Number: | |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **P043** |
| Company Equipment ID: | Coat 06 |
| Superseded Permit Number: | |
| General Permit Category andType: | Not Applicable |

# A. Standard Terms and Conditions

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

# B. Facility-Wide Terms and Conditions

**1. 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).**

a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(1) None.

**2. OAC rule 3745-31-05(D) Special terms and conditions including federally enforceable limitations on potential to emit.**

The Ruscoe Company has requested federally enforceable terms and conditions to limit volatile organic compound(VOC) and hazardous air pollutant(HAP) emissions beneath major source thresholds to avoid Title V of the 1990 Clean Air Act and 40 CFR 63 Subpart HHHHH, *National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing*. After obtaining this FEPTIO,facility-wide total HAP potential emissions are limited9.96 TPY. The facility-wide VOC potential emissions are 14.5 TPY. VOC and HAP emissions have been limited throughvoluntary operational restrictions, work practices, and through the inclusion of appropriate monitoring, record keeping and reporting requirements.

a) <u>Emission Limitations:</u>

Facility-wide VOC and HAP emissions shall not exceed 14.5 tons per year and 9.96 tons per year respectively, based on a rolling 12-month summation of emissions. The following calculations were used to determine the facility-wide allowable emissions, taking into account the federally-enforceable restrictions and the “worst-case” sealant recipe emission factors provided by the permittee.

[7,360,000 lb/yr sealant mixed] × [0.00380lb VOC emissions/lb ingredients] / [2000 lb/ton] + [0.52 ton/yr VOC PTE for other non-permitted units at the facility] = **14.5 ton/yr VOC**

[7,360,000lb/yr sealant mixed] × [0.00269lb HAP emissions/lb ingredients] ÷ [2000 lb/ton] + [0.06 ton/yr HAP PTE for other non-permitted units at the facility] = **9.96 ton/yr total HAP**

<u>Applicable Compliance Method:</u>

Compliance shall be demonstrated using the voluntary restriction on the product recipes, condenser control device requirements, annual production limitations, and through the inclusion of appropriate monitoring, record keeping and reporting requirements; all of which are located in section **“C. Emissions Units Terms and Conditions”** below.

# C. Emissions Unit Terms and Conditions

## 1. Emissions Unit Group - VOC Controlled Units: P025, P026, P028, P030, P031, P032, P033, P034, P035, P036

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P025 | Sealant Mixer Coat 13 |
| P026 | Sealant Mixer Coat 14 |
| P028 | Sealant Mixer Coat 16 |
| P030 | Sealant Mixer Coat 18 |
| P031 | Sealant Mixer Coat 19 |
| P032 | Sealant Mixer Coat 20 |
| P033 | Sealant Mixer Coat 21 |
| P034 | Sealant Mixer Coat 22 |
| P035 | Sealant Mixer Coat 23 |
| P036 | Sealant Mixer Coat 24 |

a) 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. b)(1)f., d)(5), d)(6), d)(7), and e)(5).

(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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3) | See b)(2)a. |
| b. | OAC rule 3745-31-05(D) | See b)(2)b. |
| c. | OAC rule 3745-17-07(B)(1) | The visible emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-17-08(B). |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| d. | OAC rule 3745-17-08(B) | There shall be no visible emissions of fugitive dust emitted from doors, windows and/or any other openings from the building.<br><br>See b)(2)c. |
| e. | OAC rule 3745-21-07(M)(2) | Each unit shall be equipped and operated with a chilled water condenser capable of achieving an overall volatile organic compound (VOC) control efficiency of at least 85%, by weight. |
| f. | OAC rule 3745-114-01 | See d)(5), d)(6), and d)(7) |

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirement established for these emission units is less stringent than the requirement pursuant to OAC rule 3745-21-07(M)(2). Therefore, compliance with OAC rule 3745-21-07(M)(2) will satisfy the BAT requirement for these emission units.

b. Synthetic Minor Restrictions

For purposes of securing federally enforceable terms to avoid federal based PSD, NNSR and/or Title V rules, the following production and emission limitations apply:

i. No sealant recipe shall be mixed in any unit which results in an emission rate greater than 0.00380 pound of VOC emissions per pound of ingredients, and/or 0.00269 pound of hazardous air pollutant (HAP) emissions per pound of ingredients.

ii. The total facility-wide solvent-containing sealant/adhesive production, based on a rolling 12-month summation, shall not exceed 7,360,000 pounds. These emission units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the facility-wide solvent-containing sealant/adhesive production.

c. The permittee shall employ reasonably available control measures (i.e., building enclosure) which are sufficient to eliminate visible emissions of fugitive dust.

c) Operational Restrictions

(1) The chilled water condenser shall be in operation whenever this emission unit is in operation.

(2) The temperature of the cooling water coming out of the chiller, before entering the heat exchanger of the condenser, shall not be greater than 55 degrees Fahrenheit when the emissions unit is in operation and mixing a solvent containing material.

The temperature of the cooling water coming out of the chiller entering the heat exchanger of the condenser limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted cooling water temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the cooling water temperature range/limit 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) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation and mixing a solvent-containing material. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

Whenever the monitored temperature of the cooling water coming out of the chiller entering the heat exchanger of the condenser deviates from the limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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 value specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was deviation;

e. the temperature readings of the cooling water coming out of the chiller entering the heat exchanger of the condenser immediately after the corrective action was implemented; and

f. the name(s) 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.

(2) The permittee shall maintain daily records that document any time periods when the condenser was not in service when the emissions unit was in operation.

(3) The permittee shall record the cooling water (chiller outlet) temperature on a once per shift basis, when the emissions unit is in operation and mixing a solvent-containing material.

(4) Monthly Records

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

a. the monthly facility-wide solvent-containing sealant/adhesive production, in pounds;

b. the rolling, 12-month summation of the facility-wide solvent-containing sealant/adhesive production, in pounds;

c. the calculated monthly VOC and HAPs emissions, in tons, from each emissions unit;

i. The facility has elected to use a “worst-case” approach to calculate VOC and HAPs emissions. The pounds of emissions per pound of ingredients emission limitations, located in b)(2)b.i. above, represent the worst case recipes that the facility can produce. Therefore, emissions shall be calculated by multiplying the respective “worst-case” emission factor (in lbs emissions/lb ingredients) by the monthly facility-wide solvent-containing sealant/adhesive production (in lbs).

d. the calculated rolling, 12-month summation of VOC and HAPs emissions, in tons, from each emissions unit; and

e. the calculated rolling, 12-month summation of VOC and HAPs emissions, in tons, facility-wide.

(5) The FEPTIO application for this/these emissions unit(s), P017, P018, P019, P020, P021, P022, P023, P025, P026, P027, P028, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P041, P042, and P043 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The"Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X"** hours per day and "**Y"** days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: **trichloroethylene**w/ option to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): **53.7**

Maximum Hourly Emission Rate (lbs/hr):**7.40**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **960**

MAGLC (ug/m3): **1,280**

The permittee has demonstrated that emissions of **trichloroethylene** from emissions unit(s) P017, P018, P019, P020, P021, P022, P023, P025, P026, P027, P028, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P041, P042, and P043 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the ”Toxic Air Contaminant Statute”, ORC 3704.03(F).

(6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the ”Toxic Air Contaminant Statute” 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 a non-restrictive change to a parameter or process operation, where compliance with the ”Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the ”Toxic Air Contaminant Statute”, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the ”Toxic Air Contaminant Statute”, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the ”Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the ”Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. the rolling, 12-month restriction on the production of the solvent-containing sealant/adhesives mixed at the facility of 7,360,000 pounds;

ii. any exceedance of the lb emissions/lb ingredients emission limitations located in b)(2)b.i. above.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall also identify the following information in the annual PER:

a. all days during which any visible fugitive particulate emissions were observed emanating from the building;

b. any corrective actions taken to eliminate the visible particulate emissions;

c. all temperature readings that indicated the cooling water from the chiller, before entering the condenser, was greater than 55 degrees Fahrenheit, when the emissions unit is in operation and mixing a solvent-containing material;

d. any corrective actions taken to reduce the condenser water temperature to below 55 degrees Fahrenheit; and

e. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and mixing a solvent-containing material and the process emissions were not vented to the condenser.

(4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

There shall be no visible emissions of fugitive dust emitted from windows, doors and/or any other openingsfrom the building.

Applicable Compliance Method:

If required, compliance with the visible particulate emission of fugitive dust limitation shall be determined in accordance with U.S. EPA Method 22 of 40 CFR Part 60, Appendix A.

b. Operational Restriction:

Each unit shall be equipped and operated with a chilled water condenser capable of achieving an overall VOC control efficiency of at least 85%, by weight.

Applicable Compliance Method:

If required, compliance with this operational restriction shall be based on testing in accordance with Methods 1 – 4 and 18, 25, or 25A, as applicable, (for control efficiency) and Method 204 (for capture efficiency) of 40 CFR Part 60, Appendix A.

[The overall efficiency is calculated by multiplying the control efficiency by the capture efficiency.]

c. Emission Limitation:

No sealant recipe shall be mixed in any unit which results in an emission rate greater than 0.00380 pounds of VOC emissions per pound of ingredients, and/or 0.00269 pounds of HAP emissions per pound of ingredients.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the VOC emission limitations based on the results of emission testing conducted in accordance with Methods 1-4, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

**2. Emissions Unit Group – VOC Uncontrolled Units: P017, P018, P019, P020, P021, P022, P023, P027, P037, P038, P039, P041, P042, P043**

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P017 | Sealant Mixer Coat 02 |
| P018 | Sealant Mixer Coat 04 |
| P019 | Sealant Mixer Coat 07 |
| P020 | Sealant Mixer Coat 08 |
| P021 | Sealant Mixer Coat 09 |
| P022 | Sealant Mixer Coat 10 |
| P023 | Sealant Mixer Coat 11 |
| P027 | Sealant Mixer Coat 15 |
| P037 | Sealant Mixer Coat 25 |
| P038 | Drum Mixer Pack 29 |
| P039 | Sealant Mixer Coat 30 |
| P041 | Sealant Mixer Coat 03 |
| P042 | Sealant Mixer Coat 05 |
| P043 | Sealant Mixer Coat 06 |

a) 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. b)(1)f., d)(2), d)(3), d)(4), e)(5).

(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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3) | BAT requirements are equivalent to the federally-enforceable synthetic minor restrictions established in b)(1)b. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| b. | OAC rule 3745-31-05(D) | See b)(2)a. |
| c. | OAC rule 3745-17-07(B)(1) | The visible emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-17-08(B). |
| d. | OAC rule 3745-17-08(B) | There shall be no visible emissions of fugitive dust emitted from doors, windows and/or any other openings from the building.<br><br>See b)(2)b. |
| e. | OAC rule 3745-114-01 | See d)(2), d)(3), and d)(4). |

(2) Additional Terms and Conditions

a. Synthetic Minor Restrictions

For purposes of securing federally enforceable terms to avoid federal based PSD, NNSR and/or Title V rules, the following production and emission limitations apply:

i. No sealant recipe shall be mixed in any unit which results in an emission rate greater than 0.00380 pounds of VOC emissions per pound of ingredients, and/or 0.00269 pounds of hazardous air pollutant (HAPs) emissions per pound of ingredients.

ii. The total facility-wide solvent-containing sealant/adhesive production, based on a rolling 12-month summation, shall not exceed 7,360,000 pounds. These emission units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the facility-wide solvent-containing sealant/adhesive production.

b. The permittee shall employ reasonably available control measures (i.e., building enclosure) which are sufficient to eliminate visible emissions of fugitive dust.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Monthly Records

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

a. the monthly facility-wide solvent-containing sealant/adhesive production, in pounds;

b. the rolling, 12-month summation of the facility-wide solvent-containing sealant/adhesive production, in pounds;

c. the calculated monthly VOC and HAPs emissions, in tons, from each emissions unit;

i. The facility has elected to use a "worst-case" approach to calculate VOC and HAPs emissions. The pounds of emissions per pound of ingredients emission limitations, located in b)(2)a.i. above, represent the worst case recipes that the facility can produce. Therefore, emissions shall be calculated by multiplying the respective "worst-case" emission factor (in lbs emissions/lb ingredients) by the monthly facility-wide solvent-containing sealant/adhesive production (in lbs).

d. the calculated rolling, 12-month summation of VOC and HAPs emissions, in tons, from each emissions unit; and

e. the calculated rolling, 12-month summation of VOC and HAPs emissions, in tons, facility-wide.

(2) The FEPTIO application for this/these emissions unit(s), P017, P018, P019, P020, P021, P022, P023, P025, P026, P027, P028, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P041, P042, and P043 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The"Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X"** hours per day and "**Y"** days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: **trichloroethylene**w/ option to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): **53.7**

Maximum Hourly Emission Rate (lbs/hr):**7.40**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **960**

MAGLC (ug/m3): **1,280**

The permittee has demonstrated that emissions of **trichloroethylene** from emissions unit(s) P017, P018, P019, P020, P021, P022, P023, P025, P026, P027, P028, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P041, P042, and P043 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the ”Toxic Air Contaminant Statute” 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 a non-restrictive change to a parameter or process operation, where compliance with the ”Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the ”Toxic Air Contaminant Statute”, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the ”Toxic Air Contaminant Statute”, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the ”Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the ”Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the

potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. the rolling, 12-month restriction on the production of the solvent-containing sealant/adhesives mixed at the facility of 7,360,000 pounds;

ii. any exceedance of the lb emissions/lb ingredients emission limitations located in b)(2)a.i. above.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall identify the following information in the annual PER:

a. all days during which any visible fugitive particulate emissions were observed emanating from the building;

b. any corrective actions taken to eliminate the visible particulate emissions;

(4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum

ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

There shall be no visible emissions of fugitive dust emitted from windows, doors and/or any other openingsfrom the building.

Applicable Compliance Method:

If required, compliance with the visible particulate emission of fugitive dust limitation shall be determined in accordance with U.S. EPA Method 22 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

No sealant recipe shall be mixed in any unit which results in an emission rate greater than 0.00380 pounds of VOC emissions per pound of ingredients, and/or 0.00269 pounds of HAP emissions per pound of ingredients.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the VOC emission limitations based on the results of emission testing conducted in accordance with Methods 1-4, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.