

Facility ID: 1318002663 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.

- [Go to Part II for Emissions Unit P001](#)
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Facility ID: 1318002663 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 - Mica coating line 42	OAC Rule 3745-21-09 (NN)(2)	VOC emissions shall not exceed 5 tons per year (tpy) from all coatings and clean up materials.
	OAC rule 3745-35-07(B)	See A.2.a and A.2.b below.

2. Additional Terms and Conditions

- (a) The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tpy for any individual HAP and 24.9 tpy for any combination of HAPs from all emissions units that generate HAP emissions at this facility. Compliance with the above limitations shall be based upon a rolling, 12-month summation. The current list of emissions units at this facility are B001, B002, B003, P001, P002, P003, P005, P008, P009, P011, P012, P015, P016, P017, P018, P022, T001, T002, T004, Z002, Z003, Z004, Z006, Z007, Z008, Z009, and Z012.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating employed, in pounds per gallon, as applied;
 - c. the number of gallons of each coating employed; and
 - d. the total VOC emissions from all coatings employed, in pounds [i.e., the summation of (b x c) for each coating employed].
2. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the amount of cleanup material disposed off-site, in gallons;

- d. the VOC content of each cleanup material employed, in pounds per gallon; and
 - e. the total VOC emissions from all cleanup materials employed [i.e., summation of [(b - c)*d] for each clean up material employed], in pounds per month.
- 3. The permittee shall collect and record the following information each month for this emissions unit including a rolling, 12-month summation of HAP emissions for the entire facility:
 - a. the name and identification number of each HAP containing material employed;
 - b. the individual HAP content for each HAP, in pounds of individual HAP per gallon;
 - c. the total combined HAP content, in pounds of combined HAPs per gallon [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each HAP containing material employed;
 - e. the total individual HAP usage and emissions for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (b) times (d) for each material];
 - f. the total combined HAP usage and emissions from all HAP containing materials, in pounds or tons per month [the sum of (c) times (d) for each material];
 - g. the updated rolling, 12-month summation of usage and emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months for all emissions units at the facility that generate HAP emissions; and
 - h. the updated rolling, 12-month summation of usage and emissions for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months for all emissions units at the facility that generate HAP emissions.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Division of Air Quality (CDAQ) contact. This information does not have to be kept on a individual emissions unit basis.

D. Reporting Requirements

- 1. The permittee shall submit annual reports which specify the total VOC emissions from coatings and clean up materials from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.
- 2. The permittee shall submit deviation (excursion) reports which include the following information for all emissions units at the facility that generate HAP emissions:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tpy based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month; and
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceeds 24.9 tpy based on a rolling, 12-month summation, and the actual rolling, 12-month combined HAP emissions for each such month.

These written reports shall be submitted to the CDAQ within 30 days of the occurrence 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
VOC emissions shall not exceed 5 tpy.
 - Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.1, C.2. and D.1 above, respectively.
 - Emission Limitation
HAP emissions from emissions units at this facility shall not exceed 9.9 tpy for any single HAP.
 - Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.3 and D.2 above, respectively.
 - Emission Limitation
HAP emissions from emissions units at this facility shall not exceed 24.9 tpy for any combination of HAPs.
 - Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.3 and D.2 above, respectively.
- 2. Formulation data or U.S. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC content of the coatings/adhesives and cleanup materials. The CDAQ or Ohio EPA may require that U.S. EPA Method 24 be used to determine the VOC content of the coatings/adhesives and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating/adhesive or cleanup material, the permittee shall so notify the administrator of the U.S. EPA and shall use formulation data for that coating, adhesive, or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 1318002663 Emissions Unit ID: P003 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>
P003 - Mica coating line 36 with an infrared dryer	OAC Rule 3745-21-09 (NN)(2) OAC rule 3745-35-07(B)	VOC emissions shall not exceed 5 tons per year (tpy) from all coatings and clean up materials. See A.2.a and A.2.b below.

2. Additional Terms and Conditions

- (a) The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tpy for any individual HAP and 24.9 tpy for any combination of HAPs from all emissions units that generate HAP emissions at this facility. Compliance with the above limitations shall be based upon a rolling, 12-month summation. The current list of emissions units at this facility are B001, B002, B003, P001, P002, P003, P005, P008, P009, P011, P012, P015, P016, P017, P018, P022, T001, T002, T004, Z002, Z003, Z004, Z006, Z007, Z008, Z009, and Z012.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating employed, in pounds per gallon, as applied;
 - c. the number of gallons of each coating employed; and
 - d. the total VOC emissions from all coatings employed, in pounds [i.e., the summation of (b x c) for each coating employed].
2. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the amount of cleanup material disposed off-site, in gallons;
 - d. the VOC content of each cleanup material employed, in pounds per gallon; and
 - e. the total VOC emissions from all cleanup materials employed [i.e., summation of [(b - c)*d] for each clean up material employed], in pounds per month.
3. The permittee shall collect and record the following information each month for this emissions unit including a rolling, 12-month summation of HAP emissions for the entire facility:
 - a. the name and identification number of each HAP containing material employed;
 - b. the individual HAP content for each HAP, in pounds of individual HAP per gallon;
 - c. the total combined HAP content, in pounds of combined HAPs per gallon [sum all the individual HAP contents from (b)];

- d. the number of gallons of each HAP containing material employed;
 - e. the total individual HAP usage and emissions for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (b) times (d) for each material];
 - f. the total combined HAP usage and emissions from all HAP containing materials, in pounds or tons per month [the sum of (c) times (d) for each material];
 - g. the updated rolling, 12-month summation of usage and emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months for all emissions units at the facility that generate HAP emissions; and
 - h. the updated rolling, 12-month summation of usage and emissions for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months for all emissions units at the facility that generate HAP emissions.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Division of Air Quality (CDAQ) contact. This information does not have to be kept on a individual emissions unit basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from coatings and clean up materials from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.
2. The permittee shall submit deviation (excursion) reports which include the following information for all emissions units at the facility that generate HAP emissions:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tpy based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month; and
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceeds 24.9 tpy based on a rolling, 12-month summation, and the actual rolling, 12-month combined HAP emissions for each such month.

These written reports shall be submitted to the CDAQ within 30 days of the occurrence 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
VOC emissions shall not exceed 5 tpy.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.1, C.2. and D.1 above, respectively.

Emission Limitation
HAP emissions from emissions units at this facility shall not exceed 9.9 tpy for any single HAP.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.3 and D.2 above, respectively.

Emission Limitation
HAP emissions from emissions units at this facility shall not exceed 24.9 tpy for any combination of HAPs.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.3 and D.2 above, respectively.
2. Formulation data or U.S. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC content of the coatings/adhesives and cleanup materials. The CDAQ or Ohio EPA may require that U.S. EPA Method 24 be used to determine the VOC content of the coatings/adhesives and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating/adhesive or cleanup material, the permittee shall so notify the administrator of the U.S. EPA and shall use formulation data for that coating, adhesive, or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

1. None

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Facility ID: 1318002663 Emissions Unit ID: P005 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>
P005 - Line 31 - continuous mica coater with drying oven and thermal oxidizer	OAC rule 3745-21-09(NN)(1)	VOC emissions shall be controlled by an emission control system with a capture efficiency of 100% and a control destruction efficiency of at least 95%, by weight.
	OAC rule 3745-35-07(B) Synthetic minor to avoid MACT	See A.2.a and A.2.b below. See sections A.2.c and A.2.d below.

2. Additional Terms and Conditions

- (a) This emissions unit shall employ a thermal incinerator as the control device for the VOC emissions. This emissions unit shall employ a permanent total enclosure that complies with USEPA method 204. The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tpy for any individual HAP and 24.9 tpy for any combination of HAPs from all emissions units that generate HAP emissions at this facility. Compliance with the above limitations shall be based upon a rolling, 12-month summation. The current list of emissions units at this facility are B001, B002, B003, P001, P002, P003, P005, P008, P009, P011, P012, P015, P016, P017, P018, P022, T001, T002, T004, Z002, Z003, Z004, Z006, Z007, Z008, Z009, and Z012.

B. Operational Restrictions

- 1. The average combustion temperature within the thermal oxidizer, for any 3-hour period when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The permittee must monitor the thermal oxidizer and comply with the record keeping and reporting requirements in Section(s) C.1 and D.1.
- 3. The permanent total enclosure shall be maintained under negative pressure at a minimum differential pressure of 0.007 in of water, as a 3-hr average, at all times when the mica coating line is in operation.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit or Celsius. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be 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 for each day this emissions unit is in operation:

- a. all 3-hour periods (during actual coating operations) during which the average combustion temperature within the combustion chamber of the thermal oxidizer is more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance;

- b. a log of the downtime for the capture (collection) system, control system, and monitoring equipment, when the associated emissions unit is in operation;

- c. all time periods of mixing or coating operations when the emission control device is malfunctioning or not in use; and

- d. all time periods of mixing or coating operations when each monitoring device is malfunctioning or not in use.

- 2. The permittee shall maintain and operate monitoring devices and a recorder to simultaneously and continuously measure and record the pressure differential between the inside and the adjacent area outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

- 3. The permittee shall collect and record the following information each month for this emissions unit including a rolling, 12-month summation of HAP emissions for the entire facility:

- a. the name and identification number of each HAP containing material employed;

- b. the individual HAP content for each HAP, in pounds of individual HAP per gallon;

- c. the total combined HAP content, in pounds of combined HAPs per gallon [sum all the individual HAP contents]

from (b));

- d. the number of gallons of each HAP containing material employed;
- e. the total individual HAP usage and emissions for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (b x d)x(1 - overall control efficiency) for each material] see ** note below;
- f. the total combined HAP usage and emissions from all HAP containing materials, in pounds or tons per month [the sum of (c x d)x(1 - overall control efficiency) for each material] see ** note below;
- g. the updated rolling, 12-month summation of usage and emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months for all emissions units at the facility that generate HAP emissions; and
- h. the updated rolling, 12-month summation of usage and emissions for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months for all emissions units at the facility that generate HAP emissions.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Division of Air Quality (CDAQ) contact. This information does not have to be kept on a individual emissions unit basis.

** The thermal oxidizer overall control efficiency only applies to emissions units P005 and P017 where the overall control efficiency is determined from the most recent stack test that demonstrated compliance.

D. Reporting Requirements

1. The permittee shall submit quarterly summaries to the CDAQ of the records which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance and/or any records of downtime for the capture (collection) system, the thermal incinerator, or the monitoring equipment when the emissions unit was in operation. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.
2. The permittee shall submit quarterly deviation reports that identify all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water, as a 3-hour average. These reports shall be submitted to the CDAQ by April 30, July 31, October 31, and January 31.
3. The permittee shall submit deviation (excursion) reports which include the following information for all emissions units at the facility that generate HAP emissions:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tpy based on a rolling, 12-month summation and the actual rolling, 12-month individual HAP emissions for each such month; and
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 24.5 tpy based on a rolling, 12-month summation and the actual rolling, 12-month combined HAP emissions for each such month.

These reports shall be submitted to the CDAQ within 30 days of the occurrence of the deviation.

E. Testing Requirements

1. Compliance with the emission limitations specified in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 Emission Limitation
 VOC emissions shall be controlled by an emission control system with a capture efficiency of 100% and a control destruction efficiency of at least 95%, by weight.

 Applicable Compliance Method
 Compliance with control and capture efficiency shall be determined in accordance with the test methods and procedures specified in Section E.2 of these terms and conditions.
 Emission Limitation
 HAP emissions from emissions units at this facility shall not exceed 9.9 tpy for any single HAP.

 Applicable Compliance Method
 Compliance shall be determined from the record keeping and reporting Sections C.3 and D.3. respectively.
 Emission Limitation
 HAP emissions from emissions units at this facility shall not exceed 24.9 tpy for any combination of HAPs.

 Applicable Compliance Method
 Compliance shall be determined from the record keeping and reporting Sections C.3 and D.3. respectively.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 The emission testing shall be conducted 6 months prior to expiration of this permit.
 The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC emissions.
 The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-

21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. Method 25 or 25A of 40 CFR Part 60, Appendix A shall be used to demonstrate compliance with the destruction efficiency. The permittee shall test both the inlet and outlet of the control device.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CDAQ.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CDAQ. 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 CDAQ's refusal to accept the results of the emission test(s).

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the CDAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the CDAQ.

Personnel from the CDAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

F. Miscellaneous Requirements

- 1. None

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Part II - Special Terms and Conditions

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- 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>
P011 - Mica hand coating line 4 with a drying oven	OAC Rule 3745-21-09 (NN)(2) OAC rule 3745-35-07(B)	VOC emissions shall not exceed 5 tons per year (tpy) from all coatings and clean up materials. See A.2.a and A.2.b below.

- 2. **Additional Terms and Conditions**
 - (a) The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tpy for any individual HAP and 24.9 tpy for any combination of HAPs from all emissions units that generate HAP emissions at this facility. Compliance with the above limitations shall be based upon a rolling, 12-month summation. The current list of emissions units at this facility are B001, B002, B003, P001, P002, P003, P005, P008, P009, P011, P012, P015, P016, P017, P018, P022, T001, T002, T004, Z002, Z003, Z004, Z006, Z007, Z008, Z009, and Z012.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for the coating operation:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating employed, in pounds per gallon, as applied;
 - c. the number of gallons of each coating employed; and

- d. the total VOC emissions from all coatings employed, in pounds [i.e., the summation of (b x c) for each coating employed].
2. The permittee shall collect and record the following information for each month for this emissions unit:
- the company identification of each cleanup material employed;
 - the number of gallons of each cleanup material employed;
 - the amount of cleanup material disposed off-site, in gallons;
 - the VOC content of each cleanup material employed, in pounds per gallon; and
 - the total VOC emissions from all cleanup materials employed [i.e., summation of [(b - c)*d] for each clean up material employed], in pounds per month.
3. The permittee shall collect and record the following information each month for this emissions unit including a rolling, 12-month summation of HAP emissions for the entire facility:
- the name and identification number of each HAP containing material employed;
 - the individual HAP content for each HAP, in pounds of individual HAP per gallon;
 - the total combined HAP content, in pounds of combined HAPs per gallon [sum all the individual HAP contents from (b)];
 - the number of gallons of each HAP containing material employed;
 - the total individual HAP usage and emissions for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (b) times (d) for each material];
 - the total combined HAP usage and emissions from all HAP containing materials, in pounds or tons per month [the sum of (c) times (d) for each material];
 - the updated rolling, 12-month summation of usage and emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months for all emissions units at the facility that generate HAP emissions; and
 - the updated rolling, 12-month summation of usage and emissions for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months for all emissions units at the facility that generate HAP emissions.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Division of Air Quality (CDAQ) contact. This information does not have to be kept on a individual emissions unit basis.

D. Reporting Requirements

- The permittee shall submit annual reports which specify the total VOC emissions from coatings and clean up materials from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.
- The permittee shall submit deviation (excursion) reports which include the following information for all emissions units at the facility that generate HAP emissions:
 - an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tpy based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month; and
 - an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceeds 24.9 tpy based on a rolling, 12-month summation, and the actual rolling, 12-month combined HAP emissions for each such month.

These written reports shall be submitted to the CDAQ within 30 days of the occurrence of the deviation.

E. Testing Requirements

- 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
VOC emissions shall not exceed 5 tpy.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.1, C.2. and D.1 above, respectively.

Emission Limitation
HAP emissions from emissions units at this facility shall not exceed 9.9 tpy for any single HAP.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.3 and D.2 above, respectively.

Emission Limitation
HAP emissions from emissions units at this facility shall not exceed 24.9 tpy for any combination of HAPs.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.3 and D.2 above, respectively.
- Formulation data or U.S. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC content of the coatings/adhesives and cleanup materials. The CDAQ or Ohio EPA may require that U.S. EPA

Method 24 be used to determine the VOC content of the coatings/adhesives and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating/adhesive or cleanup material, the permittee shall so notify the administrator of the U.S. EPA and shall use formulation data for that coating, adhesive, or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

- 1. None

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

Facility ID: 1318002663 Emissions Unit ID: P012 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>
P012 - Mica coating laminator 211 with an infrared oven	OAC Rule 3745-21-09 (NN)(2) OAC rule 3745-35-07(B)	VOC emissions shall not exceed 5 tons per year (tpy) from all coatings and clean up materials. See A.2.a and A.2.b below.

2. Additional Terms and Conditions

- (a) The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tpy for any individual HAP and 24.9 tpy for any combination of HAPs from all emissions units that generate HAP emissions at this facility. Compliance with the above limitations shall be based upon a rolling, 12-month summation. The current list of emissions units at this facility are B001, B002, B003, P001, P002, P003, P005, P008, P009, P011, P012, P015, P016, P017, P018, P022, T001, T002, T004, Z002, Z003, Z004, Z006, Z007, Z008, Z009, and Z012.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for the coating operation:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating employed, in pounds per gallon, as applied;
 - c. the number of gallons of each coating employed; and
 - d. the total VOC emissions from all coatings employed, in pounds [i.e., the summation of (b x c) for each coating employed].
- 2. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the amount of cleanup material disposed off-site, in gallons;
 - d. the VOC content of each cleanup material employed, in pounds per gallon; and
 - e. the total VOC emissions from all cleanup materials employed [i.e., summation of [(b - c)*d] for each clean up material employed], in pounds per month.

3. The permittee shall collect and record the following information each month for this emissions unit including a rolling, 12-month summation of HAP emissions for the entire facility:
 - a. the name and identification number of each HAP containing material employed;
 - b. the individual HAP content for each HAP, in pounds of individual HAP per gallon;
 - c. the total combined HAP content, in pounds of combined HAPs per gallon [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each HAP containing material employed;
 - e. the total individual HAP usage and emissions for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (b) times (d) for each material];
 - f. the total combined HAP usage and emissions from all HAP containing materials, in pounds or tons per month [the sum of (c) times (d) for each material];
 - g. the updated rolling, 12-month summation of usage and emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months for all emissions units at the facility that generate HAP emissions; and
 - h. the updated rolling, 12-month summation of usage and emissions for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months for all emissions units at the facility that generate HAP emissions.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Division of Air Quality (CDAQ) contact. This information does not have to be kept on a individual emissions unit basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from coatings and clean up materials from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.
 2. The permittee shall submit deviation (excursion) reports which include the following information for all emissions units at the facility that generate HAP emissions:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tpy based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month; and
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceeds 24.9 tpy based on a rolling, 12-month summation, and the actual rolling, 12-month combined HAP emissions for each such month.
- These written reports shall be submitted to the CDAQ within 30 days of the occurrence 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
VOC emissions shall not exceed 5 tpy.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.1, C.2. and D.1 above, respectively.

Emission Limitation
HAP emissions from emissions units at this facility shall not exceed 9.9 tpy for any single HAP.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.3 and D.2 above, respectively.

Emission Limitation
HAP emissions from emissions units at this facility shall not exceed 24.9 tpy for any combination of HAPs.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.3 and D.2 above, respectively.
2. Formulation data or U.S. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC content of the coatings/adhesives and cleanup materials. The CDAQ or Ohio EPA may require that U.S. EPA Method 24 be used to determine the VOC content of the coatings/adhesives and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating/adhesive or cleanup material, the permittee shall so notify the administrator of the U.S. EPA and shall use formulation data for that coating, adhesive, or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

1. None

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Facility ID: 1318002663 Emissions Unit ID: P015 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>
P015 - Mica hand coating line M-5	OAC Rule 3745-21-09 (NN)(2)	VOC emissions shall not exceed 5 tons per year (tpy) from all coatings and clean up materials.
	OAC rule 3745-35-07(B)	See A.2.a and A.2.b below.

2. Additional Terms and Conditions

- (a) The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tpy for any individual HAP and 24.9 tpy for any combination of HAPs from all emissions units that generate HAP emissions at this facility. Compliance with the above limitations shall be based upon a rolling, 12-month summation. The current list of emissions units at this facility are B001, B002, B003, P001, P002, P003, P005, P008, P009, P011, P012, P015, P016, P017, P018, P022, T001, T002, T004, Z002, Z003, Z004, Z006, Z007, Z008, Z009, and Z012.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating employed, in pounds per gallon, as applied;
 - c. the number of gallons of each coating employed; and
 - d. the total VOC emissions from all coatings employed, in pounds [i.e., the summation of (b x c) for each coating employed].
2. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the amount of cleanup material disposed off-site, in gallons;
 - d. the VOC content of each cleanup material employed, in pounds per gallon; and
 - e. the total VOC emissions from all cleanup materials employed [i.e., summation of [(b - c)*d] for each clean up material employed], in pounds per month.
3. The permittee shall collect and record the following information each month for this emissions unit including a rolling, 12-month summation of HAP emissions for the entire facility:
 - a. the name and identification number of each HAP containing material employed;
 - b. the individual HAP content for each HAP, in pounds of individual HAP per gallon;
 - c. the total combined HAP content, in pounds of combined HAPs per gallon [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each HAP containing material employed;
 - e. the total individual HAP usage and emissions for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (b) times (d) for each material];
 - f. the total combined HAP usage and emissions from all HAP containing materials, in pounds or tons per month

[the sum of (c) times (d) for each material];

g. the updated rolling, 12-month summation of usage and emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months for all emissions units at the facility that generate HAP emissions; and

h. the updated rolling, 12-month summation of usage and emissions for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months for all emissions units at the facility that generate HAP emissions.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Division of Air Quality (CDAQ) contact. This information does not have to be kept on a individual emissions unit basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from coatings and clean up materials from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.
2. The permittee shall submit deviation (excursion) reports which include the following information for all emissions units at the facility that generate HAP emissions:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tpy based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month; and
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceeds 24.9 tpy based on a rolling, 12-month summation, and the actual rolling, 12-month combined HAP emissions for each such month.

These written reports shall be submitted to the CDAQ within 30 days of the occurrence 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
VOC emissions shall not exceed 5 tpy.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.1, C.2. and D.1 above, respectively.

Emission Limitation
HAP emissions from emissions units at this facility shall not exceed 9.9 tpy for any single HAP.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.3 and D.2 above, respectively.

Emission Limitation
HAP emissions from emissions units at this facility shall not exceed 24.9 tpy for any combination of HAPs.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.3 and D.2 above, respectively.
2. Formulation data or U.S. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC content of the coatings/adhesives and cleanup materials. The CDAQ or Ohio EPA may require that U.S. EPA Method 24 be used to determine the VOC content of the coatings/adhesives and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating/adhesive or cleanup material, the permittee shall so notify the administrator of the U.S. EPA and shall use formulation data for that coating, adhesive, or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

1. None

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Facility ID: 1318002663 Emissions Unit ID: P016 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>
P016 - Mica hand coating line M-7	OAC Rule 3745-21-09 (NN)(2)	VOC emissions shall not exceed 5 tons per year (tpy) from all coatings and clean up materials.
	OAC rule 3745-35-07(B)	See A.2.a and A.2.b below.

2. Additional Terms and Conditions

- (a) The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tpy for any individual HAP and 24.9 tpy for any combination of HAPs from all emissions units that generate HAP emissions at this facility. Compliance with the above limitations shall be based upon a rolling, 12-month summation. The current list of emissions units at this facility are B001, B002, B003, P001, P002, P003, P005, P008, P009, P011, P012, P015, P016, P017, P018, P022, T001, T002, T004, Z002, Z003, Z004, Z006, Z007, Z008, Z009, and Z012.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
- the name and identification number of each coating employed;
 - the VOC content of each coating employed, in pounds per gallon, as applied;
 - the number of gallons of each coating employed; and
 - the total VOC emissions from all coatings employed, in pounds [i.e., the summation of (b x c) for each coating employed].
2. The permittee shall collect and record the following information for each month for this emissions unit:
- the company identification of each cleanup material employed;
 - the number of gallons of each cleanup material employed;
 - the amount of cleanup material disposed off-site, in gallons;
 - the VOC content of each cleanup material employed, in pounds per gallon; and
 - the total VOC emissions from all cleanup materials employed [i.e., summation of [(b - c)*d] for each clean up material employed], in pounds per month.
3. The permittee shall collect and record the following information each month for this emissions unit including a rolling, 12-month summation of HAP emissions for the entire facility:
- the name and identification number of each HAP containing material employed;
 - the individual HAP content for each HAP, in pounds of individual HAP per gallon;
 - the total combined HAP content, in pounds of combined HAPs per gallon [sum all the individual HAP contents from (b)];
 - the number of gallons of each HAP containing material employed;
 - the total individual HAP usage and emissions for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (b) times (d) for each material];
 - the total combined HAP usage and emissions from all HAP containing materials, in pounds or tons per month [the sum of (c) times (d) for each material];
 - the updated rolling, 12-month summation of usage and emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months for all emissions units at the facility that generate HAP emissions; and
 - the updated rolling, 12-month summation of usage and emissions for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months for all emissions units at the facility that generate HAP emissions.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Division of Air Quality (CDAQ) contact. This information does not have to be kept on a individual emissions unit basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from coatings and clean up

materials from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

2. The permittee shall submit deviation (excursion) reports which include the following information for all emissions units at the facility that generate HAP emissions:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tpy based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month; and
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceeds 24.9 tpy based on a rolling, 12-month summation, and the actual rolling, 12-month combined HAP emissions for each such month.

These written reports shall be submitted to the CDAQ within 30 days of the occurrence 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
VOC emissions shall not exceed 5 tpy.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.1, C.2. and D.1 above, respectively.

Emission Limitation
HAP emissions from emissions units at this facility shall not exceed 9.9 tpy for any single HAP.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.3 and D.2 above, respectively.

Emission Limitation
HAP emissions from emissions units at this facility shall not exceed 24.9 tpy for any combination of HAPs.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.3 and D.2 above, respectively.
2. Formulation data or U.S. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC content of the coatings/adhesives and cleanup materials. The CDAQ or Ohio EPA may require that U.S. EPA Method 24 be used to determine the VOC content of the coatings/adhesives and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating/adhesive or cleanup material, the permittee shall so notify the administrator of the U.S. EPA and shall use formulation data for that coating, adhesive, or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

1. None

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Facility ID: 1318002663 Emissions Unit ID: P017 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>
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2. **Additional Terms and Conditions**

- (a) None

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. None

D. Reporting Requirements

- 1. None

E. Testing Requirements

- 1. None

F. Miscellaneous Requirements

- 1. None

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

Facility ID: 1318002663 Emissions Unit ID: Z001 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>
P018 - Mixing Storage Room	OAC Rule 3745-35-07	VOC emissions shall not exceed 5 tons per year (tpy) from all coating materials.
	OAC rule 3745-35-07(C)	See A.2.a and A.2.b below.

2. Additional Terms and Conditions

- (a) The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001, P003, P005, P008, P011, P012, P015, P016, P017, P018, T001, and T004 shall not exceed 9.9 tons/year for any individual HAP and 24.9 tons/year for any combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation.
The current list of emissions units at this facility are B001, B002, B003, P001, P002, P003, P005, P008, P009, P011, P012, P015, P016, P017, P018, T001, T002, T004, Z002, Z003, Z004, Z005, Z006, Z007, Z008, Z009, and Z012.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for the mixing storage:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating employed, in pounds per gallon, as applied;
 - c. the number of gallons of each coating employed; and
 - d. the total OC emissions from all coatings employed, in pounds [i.e., the summation of (b x c) for each coating employed].
- 2. The permittee shall collect and record the following information each month for the entire facility:
 - a. the name and identification number of each HAP containing material employed.
 - b. the individual HAP content for each HAP, in pounds of individual HAP per pound of material.

c. the total combined HAP content, in pounds of combined HAPs per pound of material [sum all the individual HAP contents from (b)].

d. the number of pounds of each HAP containing material employed.

e. the total individual HAP usage for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (b) times (d) for each material].

f. the total combined HAP usage from all HAP containing materials, in pounds or tons per month [the sum of (c) times (d) for each material].

g. the updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

h. the updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Division of Air Quality (CDAQ) contact. This information does not have to be kept on a individual emissions unit basis.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from all coating materials from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which include the following information for the list of emissions units referenced in section A.2.a:
 - a. An identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/year based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month;
 - b. An identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceeds 24.9 tons/year based on a rolling, 12-month summation, and the actual rolling, 12-month combined HAP emissions for each such month;

These written reports shall be submitted to the CDAQ within 30 days of the occurrence 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
VOC emissions shall not exceed 5 tons per year (tpy) from all coating materials.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.1 and D.1 above, respectively.

Emission Limitation
HAP emissions from emissions units at this facility shall not exceed 9.9 TPY for any single HAP.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.2 and D.2 above, respectively.

Emission Limitation
HAP emissions from emissions units at this facility shall not exceed 24.9 TPY for any combination of HAPs.

Applicable Compliance Method
Compliance shall be determined from the record keeping and reporting sections C.3 and D.2 above, respectively.
2. Formulation data or U.S. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC content of the coatings/adhesives and cleanup materials. The CDAQ or Ohio EPA may require that U.S. EPA Method 24 be used to determine the VOC content of the coatings/adhesives and cleanup materials. If an owner or operator determines that Method 24 cannot be used for a particular coating/adhesive or cleanup material, the permittee shall so notify the administrator of the U.S. EPA and shall use formulation data for that coating, adhesive, or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

1. None