

Facility ID: 1318002663 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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

Facility ID: 1318002663 Emissions Unit ID: P017 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
P017 - Line No. 32 - Banding Tape Machine with associated mixer and 1.5 MMBTU/hr oven controlled by a thermal oxidizer	OAC rule 3745-31-05(A)(3) (PTI 13-04333 issued 8/26/04)	<p>Volatile Organic Compound (VOC) emissions, from this emissions unit, shall not exceed 1.70 lbs/hr and 7.45 tons per year (tpy) from coatings, calculated as a 12-month rolling total.</p> <p>VOC emissions, from this emissions unit, shall not exceed 0.2 tpy from cleanup materials, calculated as a 12-month rolling total.</p> <p>The thermal oxidizer shall achieve a control (destruction) efficiency of at least 98 %, by weight, and the capture efficiency of the permanent total enclosure(s) shall be at least 99.5 %, by weight for VOC.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR 60, Subpart VVV.</p>
	OAC rule 3745-21-07(G)(1)	The control efficiency limitation specified by this rule is less stringent than the control efficiency limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR 60, Subpart VVV	The control efficiency limitation specified by this rule is less stringent than the control efficiency limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	See sections A.2.b and A.2.c below.
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2. Additional Terms and Conditions

- (a) VOC emissions from the banding tape coating process, P017, will be collected in a permanent total enclosure and controlled by a thermal oxidizer. The mixing equipment associated with the banding tape preparation will be located within the permanent total enclosure so that all emissions from mixing of the banding tape coatings are captured and controlled.

These emissions will be directed to a thermal oxidizer with an efficiency of at least 98% by weight. The permanent total enclosure will conform with U.S. EPA Method 204. Instead of monitoring coating usage, the facility has chosen to control the mixing associated with this emissions unit. 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 thermal oxidizer shall be operated and maintained such that the control efficiency, determined using Equation 1 specified in 40 CFR 60.743 and the test methods and procedures specified in 40 CFR 60.745 (b) through (g), is equal to or greater than 0.98. The permittee must monitor the thermal oxidizer pursuant to the requirements of 40 CFR 60.744(e) and comply with the reporting and record keeping requirements of 40 CFR 60.747(d).
3. The permanent total enclosure shall be maintained under negative pressure during the actual coating operation (except during setup, changeover or cleanup), monitoring reading shall not vary by 5 percent or more from the operating parameters established in the approved total enclosure monitoring plan, identified in section C.7 of this permit.
4. The maximum annual HAPs material usage for all emissions units at the facility that generate HAP emissions shall not exceed 9.9 tpy for any individual HAP and 24.9 tpy for any combination of HAPs, based upon a rolling, 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day this emissions unit is in operation:
 - a. the name and identification number of each coating, as applied;
 - b. the name and identification number of each cleanup material dispensed;
 - c. the total amount, in gallons, of each coating applied including any reducer added at the line;
 - d. the amount, in gallons, of each cleanup material dispensed;
 - e. the total number of hours the emissions unit was in operation;
 - f. the VOC content of each coating and cleanup material, in pounds VOC per gallon, as applied;
 - g. the total VOC emission rate for all coatings, in pounds and tons [summation of c x f) x (1 - control efficiency established during most recent emission test) for all coatings];
 - h. the average hourly emission rate [(g/e)];
 - i. the amount, in gallons, of cleanup material that is contained for disposal; and
 - j. the total emission rate for cleanup material [(f(d-i) x (1 - control efficiency established during most recent emission test)], in pounds and tons.
2. The permittee shall collect the records in section C.1 and use this information to determine, on a monthly basis the following:
 - a. the 12-month rolling VOC emissions in tons per year for all coatings.
 - b. the 12-month rolling VOC emissions in tons per year for all cleanup solvent.
3. As specified in 40 CFR 60.744(a), (e), and (i) through (k), 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 was 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 was 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.
4. The permittee shall maintain and operate monitoring devices which measures the pressure differential between the inside and the adjacent area outside the permanent total enclosure. The monitoring devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
 - a. The permittee shall record and maintain the following information on a daily basis:

All 3-hour periods (during actual coating operations) during which the differences in pressure between the permanent total enclosure and the surrounding area(s) readings vary by 5 percent or more from the operating parameters established in the approved total enclosure monitoring plan, identified in section C.7.
5. As specified in 40 CFR 60.742(c)(1), the permittee shall install, operate, and maintain a cover on the mixing equipment associated with this emissions unit and vent the VOC emissions to the thermal oxidizer.
6. The permittee shall collect and record the following information each month for for this emissions unit including a rolling, 12-month summation of the 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.

- 7. The permittee shall utilize the monitoring plan for the total enclosure in accordance with 40 CFR 60.744(h).
- 8. As specified in 40 CFR 60.744(k), the permittee shall maintain records of the measurements and calculations required in 40 CFR 60.743 and 60.744 for at least 2 years following the date of the measurements and calculations.

D. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports to the CDAQ for the items indicated below by April 30, July 31, October 31, and January 31, which shall cover the records for the previous calendar quarters:
 - a. As specified in 40 CFR 60.747(d)(4), all 3-hour periods (during actual coating operations) for the thermal oxidizer temperature monitoring when the temperature is more than 50 degrees Fahrenheit (28 degrees Celsius) below the temperature specified in section B.1; and
 - b. As specified in 40 CFR 60.747(d)(6), all 3-hour periods(during actual coating operations) for the permanent total enclosure monitoring readings that vary by 5 percent or more from the operating parameters established in the approved total enclosure monitoring plan, identified in section C.7 of this permit.
- 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling 12-month emission limitation for VOC. This written report shall be submitted to the CDAQ within 30 days of the occurrence of the deviation.
- 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 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.

- 4. As specified in 40 CFR 60.747(f), (g), and (h) the permittee shall submit the following:
 - a. All periods during actual mixing or coating operations when a required monitoring device (if any) was malfunctioning or not operating; and,
 - b. All periods during actual mixing or coating operations when the control device was malfunctioning or not operating.

These written reports shall be submitted to the CDAQ within 30 days of the occurrence of the deviation and these records shall be retained for at least two years

E. Testing Requirements

- 1. Compliance with the emission limitation(s) specified 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 1.70 lbs/hr from coatings.

Applicable Compliance Method:

Compliance may be demonstrated in accordance with the record keeping requirements contained in section C.1 of this permit. U.S. EPA Method 24 shall be used to determine the VOC content for each coating. If it is demonstrated to the satisfaction of the Director that each coating formulation data is equivalent to Method 24 results, formulation data based on weight percentage of VOC components in the coating may be used. In the event of any inconsistency between a Method 24 test and the facility's formulation data, the Method 24 test will govern.

If required by Ohio EPA or the CDAQ, compliance with the VOC emission limitation shall be determined through emission testing conducted in accordance with US EPA Method 25 or 25A of 40 CFR Part 60, Appendix A, or any US EPA approved alternative testing method.

Emission Limitation:
VOC emissions shall not exceed 7.45 tpy from coatings.

Applicable Compliance Method:

Compliance shall be demonstrated on a monthly basis by summing the monthly VOC emissions as recorded in section C.2 above from this emissions unit during the most recent 12 calendar months of operation.

Emission Limitation:
VOC emissions shall not exceed 0.2 tpy VOC from cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated on a monthly basis by summing the monthly VOC emissions as recorded in section C.2 above from this emissions unit during the most recent 12 calendar months of operation.

Emission Limitation:
98 % control (destruction) efficiency, by weight
99.5 % capture efficiency, by weight for VOC.

Applicable Compliance Method:

Compliance with the 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 or as specified by 40 CFR 60.743.

Emission Limitation:
9.9 tpy individual HAP for the list of emissions units in section A.2.c as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in section C.

Emission Limitation:
24.9 tpy combined HAPs for the list of emissions units in section A.2.c as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in section C.

2. As specified in 40 CFR 60.745, 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 within 6 months prior to expiration of this permit.
The emission testing shall be conducted to demonstrate compliance with the capture and destruction efficiency limitation for VOC emissions and the allowable hourly VOC mass rate of emissions.
Method 25 or 25A of 40 CFR Part 60, Appendix A, shall be employed to demonstrate compliance with the allowable mass emission rate and the destruction efficiency. 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 U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995.
The emission tests shall be conducted while the emissions unit is operating at or near its maximum operating capacity, unless otherwise specified or approved by the CDAQ.
The average values of the monitored parameters shall be measured at least every 15 minutes and averaged over the period of the performance test and shall be submitted with the results of all performance tests, as specified in 40 CFR 60.747(a).
The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and the outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and U.S. EPA Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A. Formulation data from the manufacturer, or if required Method 24, shall be used to determine VOC contents of the coatings. Alternative U.S. EPA approved test methods may be used with prior approval from the CDAQ.
3. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to tests may result in the CDAQ's refusal to accept the results of this emission tests.

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

A comprehensive written report on the results of the emissions tests shall be signed by the person or person responsible for the tests and submitted to the CDAQ within 30 days following completion of the tests.

F. Miscellaneous Requirements

1. None