

Facility ID: 1318002663 Issuance type: Draft 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 P018](#)

[Go to Part II for Emissions Unit P022](#)

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

Facility ID: 1318002663 Emissions Unit ID: P018 Issuance type: Draft 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>
P018 - Mixing Storage Room	OAC Rule 3745-21-07(G) OAC Rule 3745-35-07(B)	See A.2.a. below. See A.2.b. and A.2.c. below.

2. Additional Terms and Conditions

- (a) Only mixing occurs with no chemical reaction; therefore the requirements of OAC 3745-21-07(G) do not apply.
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 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 mixed/stored;
 - b. the individual HAP content for each HAP, in pounds of individual HAP per pound of VOC;
 - c. the amount, in tons, of each HAP containing material mixed/stored;
 - d. the total individual HAP usage and emissions for each HAP from all HAP containing materials, in pounds or tons per month, as determined from the following equation using the emission factor from AP-42 Table 6.4-1:
$$\text{lbs HAP/lb VOC} \times 30 \text{ lbs VOC/ton material} \times \text{tons material/month}$$
 - e. the total combined HAP usage and emissions from all HAP containing materials, in pounds or tons per month [sum all the individual HAP emissions from (e)] ;
 - f. 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
 - g. 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 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
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.1 and D.1 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.1 and D.1 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: P022 Issuance type: Draft 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>
P022 - Hand coating mica line with steam table	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