



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

11/10/2015

Todd Werstler  
 Tower Industries, Ltd.  
 2101 9th St. SW  
 Massillon, OH 44647

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
 Facility ID: 1576131942  
 Permit Number: P0108319  
 Permit Type: Initial Installation  
 County: Stark

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

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

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

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

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

If you have any questions, please contact Canton City Health Department at (330)489-3385 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: U.S. EPA  
Canton; Pennsylvania; West Virginia



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Tower Industries, Ltd.**

Facility ID:	1576131942
Permit Number:	P0108319
Permit Type:	Initial Installation
Issued:	11/10/2015
Effective:	11/10/2015





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Tower Industries, Ltd.

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**Final Permit-to-Install**  
Tower Industries, Ltd.  
**Permit Number:** P0108319  
**Facility ID:** 1576131942  
**Effective Date:** 11/10/2015

## Authorization

Facility ID: 1576131942  
Facility Description: Polymer casting and granite/quartz countertop production facility  
Application Number(s): A0011819, A0040901, A0042148  
Permit Number: P0108319  
Permit Description: New PTI for solid surface polymer casting line and panel sander/grinders.  
Permit Type: Initial Installation  
Permit Fee: \$1,800.00  
Issue Date: 11/10/2015  
Effective Date: 11/10/2015

This document constitutes issuance to:

Tower Industries, Ltd.  
2101 Ninth St. SW  
Massillon, OH 44647

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

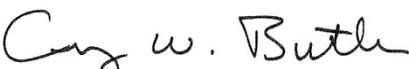
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department  
420 Market Avenue  
Canton, OH 44702-1544  
(330)489-3385

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0108319

Permit Description: New PTI for solid surface polymer casting line and panel sander/grinders.

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

<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Solid Surface Casting Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Grinders/Sanders**

<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	37" sander
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	63" wide belt sander
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
Tower Industries, Ltd.  
**Permit Number:** P0108319  
**Facility ID:** 1576131942  
**Effective Date:** 11/10/2015

## **A. Standard Terms and Conditions**

**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Canton City Health Department.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Canton City Health Department. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Canton City Health Department every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Canton City Health Department in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Canton City Health Department concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

**8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Canton City Health Department.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Canton City Health Department. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

**13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



**Final Permit-to-Install**  
Tower Industries, Ltd.  
**Permit Number:** P0108319  
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**Effective Date:** 11/10/2015

## **B. Facility-Wide Terms and Conditions**

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. Emissions unit P002 contained in this permit is subject to:
  - a) 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants:  
Reinforced Plastic Composites Production

The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Canton City Health Department, Air Pollution Control Division.

3. This facility was a major source of Hazardous Air Pollutants (HAPs) at and beyond its compliance date for an applicable MACT standard (40 CFR Part 63, Subpart WWWW), and therefore in accordance with US EPA's "Once In, Always In" policy, this facility will always be subject to the MACT standard as a major source. In accordance with Section 502 of the Clean Air Act, all facilities that are subject to a MACT standard are required to obtain a TV operating permit, unless the MACT standard states otherwise.



**Final Permit-to-Install**  
Tower Industries, Ltd.  
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## **C. Emissions Unit Terms and Conditions**

**1. P002, Solid Surface Casting Line**

**Operations, Property and/or Equipment Description:**

Solid surface polymer casting line with 6000 gallon resin storage tank, vacuum type mixer vented through an oil-bath absorber, electric curing oven, cleanup operations, and filler material addition to mixer.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)h. and b)(2)k.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)  [Best Available Technology (BAT) requirements for sources installed in 2003]	Employ work practice standards to minimize Volatile Organic Compound (VOC) emissions. See b(2)a., b(2)b. and c)(2).
c.	OAC rule 3745-17-07(B)	Exempt. See b(2)c.
d.	OAC rule 3745-17-08(B)	Exempt. See b(2)d.
e.	OAC rule 3745-17-11(A)	Exempt. See b(2)e.
f.	OAC rule 3745-21-07	Exempt. See b(2)f.
g.	OAC rule 3745-21-25	See b(2)g.- j.
h.	ORC 3704.03(F)(4)	Exempt. See b)(2)k.
i.	40 CFR Part 63, Subpart WWWW (40 CFR 63.5780-63.5935)  [In accordance with 40 CFR 63.5790(a) – 63.5790(c), this emissions unit is a polymer casting operation at a new (commenced construction after August 2, 2001) reinforced plastic composite production facility for which the only affected operations are mixing, cleaning of equipment, and HAP-containing materials storage subject to the work practice standards in Table 4 of this Subpart.]	See b(2)l.- q.,and c)(1)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
j.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-63.15) (40 CFR 63.5925)	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions (Subpart A) to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1-63.15 apply.

(2) Additional Terms and Conditions

- a. The only VOC constituents in the materials used in this Emissions Unit (EU) are the styrene in the resin and the methyl ethyl ketone peroxide (MEKP) catalyst added in the mixer. It is assumed that the MEKP is consumed in the polymerization reaction and none is emitted. Since the VOC emissions originate only from the styrene content (which is a Hazardous Air Pollutant (HAP)) in the resin, then the VOC emissions are equal to the HAP/styrene emissions.
- b. The Best Available Technology (BAT) requirements for VOC emissions pursuant to OAC rule 3745-31-05(A)(3) have been determined to be compliance with the applicable requirements of OAC rule 3745-21-25 and use of only non-VOC containing clean-up material (see c)(3)).
- c. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08
- d. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- e. This rule does not apply pursuant to OAC rule 3745-17-11(A)(1) because the closed material handling system does not release particulate emissions into the ambient air.
- f. This EU is exempt from the requirements of OAC rule 3745-21-07 pursuant to OAC rule 3745-21-07(A)(3) because it is not specified in paragraphs (K) to (N) of this rule.
- g. Pursuant to OAC rule 3745-21-25(D)(1), the mixing, equipment cleaning, and VOC-containing material storage operations of this emissions unit are subject to the requirements of OAC rule 3745-21-25. Paragraph 3745-21-25(C)(2)(j) excludes the polymer casting operation from any requirements of this rule.
- h. Pursuant to OAC rule 3745-21-25(C)(1), the permittee shall comply with the work practice standards listed below taken from Table 1 of OAC rule 3745-21-25 that apply to the affected operations of this emissions unit. Because this emissions

unit is a polymer casting operation having a mixing container with a surface area of 500 square inches or less, Note 1 of Table 1 applies where indicated:

Type of Operation	Work Practice Standard
Item #2: Cleaning of equipment	<p>*Do not use cleaning solvents (cleaners) that have a VOC content greater than 0.42 pound VOC per gallon, except cleaners used in closed systems and used to clean cured resin from application equipment.</p> <p>*Note: The use of only non-VOC containing clean-up material as required pursuant to OAC rule 3745-31-05(A)(3) (see b)(2)d. and c)(3)) is more stringent than this work practice standard.</p>
Item #3: VOC-containing materials storage operation	Keep containers that store VOC-containing materials closed or covered except during the addition or removal of materials. Bulk VOC-containing materials storage tanks may be vented as necessary for safety.
Item #5a,b, and c: Mixing  (See Note 1)	These work practice standards are equivalent to or less stringent than the work practice standards for mixing in item #6, #7, and #8 in Table 4 of Subpart WWWW.
Note 1	The mixing container may be open (vented) while active mixing is taking place.

- i. The facility's current potential to emit for VOC is less than 10 tons per year. Pursuant to OAC rule 3745-21-25(A)(2)(e), in order to demonstrate that the facility is subject to the requirements of OAC rule 3745-21-25, the permittee shall submit calculations within 60 days of the permit issuance date demonstrating that the facility once had a potential to emit for VOC equal to or greater than 10 tons per year for all reinforced plastic composite production operations combined on or after December 14, 2010..
- j. Pursuant to OAC rule 3745-21-25(O)(1)(iv), continuous compliance with the work practice standards in Table 1 of this rule is demonstrated by performing the applicable work practice required for each operation in Table 1.
- k. Pursuant to ORC 3704.03(F)(4)(e), the document entitled "Review of New Sources of Air Toxics Emissions, Option A" does not apply to an air contaminant source that is subject to a maximum achievable control technology (MACT) standard.
- l. Pursuant to the September 28, 2004 United States Environmental Protection Agency's Administrative Consent Order EPA-5-04-113(a) OH-05, item No. 51,

the permittee shall comply with all applicable requirements of the Subpart WWWW regulations to maintain compliance with this Order.

- m. Pursuant to paragraph 63.5790(b), the mixing, equipment cleaning, and HAP-containing material storage operations of this emissions unit are subject to the requirements of Subpart WWWW. Paragraph 63.5790(c) excludes the polymer casting operation from any requirements of Subpart WWWW.
- n. Pursuant to paragraph 63.5805, the permittee shall comply with the following work practice standards taken from Table 4 of Subpart WWWW that apply to the following affected operations of this emissions unit. Because this emissions unit is a polymer casting operation having a mixing container with a surface area of 500 square inches or less, Note 1 of Table 4 applies where indicated:

Type of Operation	Work Practice Standard
Item #2: Cleaning of equipment	<p>*Do not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment.</p> <p>*Note: The use of only non-VOC containing clean-up material as required pursuant to OAC rule 3745-31-05(A)(3) (see b)(2)d. and c)(3)) is more stringent than this work practice standard.</p>
Item #3: HAP-Containing materials storage	Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
Item #6: Mixing (See Note 1)	Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
Item #7: Mixing (See Note 1)	<p>Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.</p> <p>Note: Because Note 1 below is applicable, the mixer can be vented while actual mixing is occurring without the requirement to use a 95 percent efficient control device on the vent.</p>
Item #8: Mixing	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers

(See Note 1)	to the mixing vessels.
Note 1	The mixing container may be open (vented) while active mixing is taking place.

- o. Pursuant to paragraphs 63.5800 and 63.5840, the permittee must comply with the work practice standards and demonstrate initial compliance by the initial compliance date of December 8, 2003, according to Table 2, line 4, of subpart WWWW.
- p. Pursuant to paragraph 63.5860(a), the permittee must demonstrate continuous compliance with the work practice standards in Table 4 of subpart WWWW by using the procedures shown in Table 9 of subpart WWWW.
- q. Pursuant to paragraph 63.5900(a)(4), continuous compliance with the work practice standards in Table 4 of Subpart WWWW is demonstrated by performing the work practice required for each operation in Table 4. Pursuant to paragraph 63.5900(c), during periods of startup, shutdown, or malfunction, the permittee must meet the applicable work practice standards.

c) Operational Restrictions

- (1) Pursuant to paragraph 63.5835(c), the permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in 63.6(e)(1)(i).
- (2) The permittee shall use only non-VOC containing clean-up material in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable recordkeeping requirements specified in OAC rule 3745-21-25, including the following sections:

3745-21-25(P)(1)(a)	Keep a copy of each applicability notification and compliance status report submitted to comply with this rule, including all documentation supporting any applicability or compliance status.
3745-21-25(P)(1)(e)	A certified statement that operations are in compliance with the work practice standards in Table 1 of this rule, as applicable.
3745-21-25(P)(4)	All records specified under paragraph (P)(1) of this rule shall be retained by the permittee for a period of not less than 5 years following the date of each report or record.

- (2) The permittee shall comply with the applicable recordkeeping requirements specified in 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5915(a)	Keep a copy of each notification and report submitted to comply with this subpart, including <ol style="list-style-type: none"> <li>1. Documentation supporting any Initial Notification or Notification of Compliance Status submitted.</li> <li>2. Records related to start-up, shutdown, and malfunction.</li> </ol>
63.5915(d)	Keep a certified statement that operations are in compliance with the work practice requirements in Table 4 of subpart WWWW.
63.5920(a) - (d)	Comply with the recordkeeping format and retention requirements as specified in 63.10(b)(1).

- (3) The permittee shall keep a record of the maintenance completed on this emission unit and control equipment listed in c)(1) along with the manufacturer's recommendations, instructions, and/or operating manual(s).
- (4) The permittee shall maintain daily records that document:
- a. any time periods when the baghouse filtration system was not in service when filler material was being added to the mixer.
- (5) The permittee shall comply with the applicable operation, maintenance, and record keeping requirements of 63.6(e)(1).
- (6) The permittee shall collect and record the following information on a daily basis for this emissions unit:
- a. the name and identification number of the resin employed;
  - b. the tons of resin used per day;
  - c. the starting monomer (styrene) VOC content of the resin (as employed) in pounds styrene/pound resin;
  - d. the number of hours per day the emissions unit was in operation; and
  - e. the name, identification number and VOC content of the cleanup/solvent material used.
- (7) Pursuant to OAC rule 3745-21-25(F)(1), the permittee shall calculate the facility's VOC emissions threshold in tons per year using the procedures in paragraph (F)(3)(a) of this rule for an "existing facility". The permittee may use a weighted average emissions factor for VOC from polymer casting of 3% by weight of the starting monomer in the resin from AP-42, Table 4.42-2, page 4.4-8, 02/07; or any other procedure specified in 3745-21-25(F)(3)(a) or (F)(3)(b). Base the weighted average on the prior 12 months of

operation. Convert the weighted average emissions factor to lb VOC/ton resin and multiply the result by the tons of resin used in the same 12 month period. Divide the result by 2000 to convert the lbs VOC/yr to tons VOC/yr.

- a. Pursuant to OAC rule 3745-21-25(F)(4), the permittee shall initially perform this calculation based on the twelve months of operation prior to December 14, 2009, and include this information with the applicability notification report. The facility shall repeat the calculation based on the resin use in the twelve months prior to the compliance date of December 14, 2010, and submit this information within 60 days of the issuance date of this permit.
- b. After the initial compliance date of December 14, 2010, the permittee shall calculate VOC emissions over the twelve-month period ending December 31, 2010. Subsequent calculations shall cover the periods in the semiannual compliance reports.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall notify the Canton City Health Department, Air Pollution Control Division, that the affected operations are subject to OAC rule 3745-21-25. The notification shall be submitted not later than sixty days after issuance of this permit, and shall provide the information specified in paragraphs (S)(1)(a)-(e) of this rule.
- (3) The permittee shall submit applicable notifications as required in 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5860(a) and Table 9	Requirements for demonstrating initial compliance with paragraph 63.5805(c) (work practice standards from Table 4).
63.5905(a) and Table 13	Table 13, Item 2: Initial Notification of MACT determination per requirement in 63.9(b). This notification has been sent to US EPA on March 8, 2005 as part of US EPA Consent Order EPA-5-04-113(a) OH-05.  Item 6.c. Notification of Compliance Status as specified in 63.9(h)
63.5905(b)	Any change to information submitted in any notification must be submitted within 15 calendar days after the change.

- (4) The permittee shall submit semi-annual compliance status reports as required by OAC rule 3745-21-25(Q), containing the information specified in paragraphs (Q)(3)(a)-(d) and (f).
- (5) The permittee shall submit semi-annual reports and other applicable reports as required in 40 CFR Part 63, Subpart WWWW, including the following sections:

63.5910(a), (b) and Table 14	Table 14, Item 1.a.,b., and c.: Compliance reporting requirements.  Table 14, Item 2.a. and b.: Reporting requirements for an immediate startup, shutdown, and malfunction report.
63.5910(c) and Table 14	Requirements for the content of the semi-annual compliance report.
63.5910(d) and Table 14	Requirements for the content of the semi-annual compliance report for deviations from the applicable work practice standards which are not dependent on using a Continuous Monitoring System (CMS).
63.5910(h) and Table 14	Requirement to submit reports based on Table 14, not based on the requirements of 63.999.
63.5910(i) and Table 14	Requirement to state in the next compliance report if a change in compliance options has occurred.

- (6) Quarterly deviation (excursion) reports and semiannual reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- f) Testing Requirements
  - (1) None
- g) Miscellaneous Requirements
  - (1) None.

**2. Emissions Unit Group -Grinders/Sanders: P004,P006,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P004	37-inch grinder/sander exhausting to a shared baghouse
P006	63" wide belt sander exhausting to a shared baghouse

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)  [Best Available Technology (BAT) requirements for sources installed in 2003]	Particulate emissions (stack + fugitive) smaller than 10 microns in diameter (PM <sub>10</sub> ) shall not exceed:  0.644 lb/hr and 2.820 tons/yr for P004  0.322 lb/hr and 1.410 tons/yr for P006  See b)(2)a., b(2)b. and c)(1).  Visible particulate emissions from any stack serving this emissions unit shall not exceed 0% opacity as a 6-minute average.  Visible emissions of fugitive dust leaving the building shall not exceed 0% opacity as a 3-minute average. See b(2)c.
b.	OAC rule 3745-17-07(A)	The stack visible emissions limitation specified by this rule is less stringent than the stack visible emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(B)	Exempt. See b(2)d.
d.	OAC rule 3745-17-08(B)	Exempt. See b(2)e.
e.	OAC rule 3745-17-11(A)	See b(2)f.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3) have been determined to be the use of hoods and fan(s) exhausting through a baghouse for control of particulate emissions, and compliance with the PM<sub>10</sub> and visible emissions limitations listed in b)(1)a. above.
- b. It is assumed that all particulate emissions (both fugitive and stack) are PM<sub>10</sub>.
- c. This emissions unit shall be equipped with hoods, fan(s), baghouse, and other equipment to adequately enclose, contain, capture, and control the fugitive dust, and shall meet the following requirement:
  - i. The collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design and to achieve compliance with the visible emission limitations listed in b)(1)a.
- d. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08
- e. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- f. The particulate emissions limitation pursuant to OAC rule 3745-17-11(A) is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) The permittee shall operate the baghouse and the hood capture system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the baghouse in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the baghouse filtration system was not in service when the emissions unit was in operation.
- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
  - b. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (3) The permittee shall keep a record of the maintenance completed on this emission unit and control equipment listed in c)(1) along with the manufacturer's recommendations, instructions, and/or operating manual(s).
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
    - a. any daily record showing that the baghouse and the hood capture system for the control of particulate emissions was not in service.
  - (3) The permittee shall submit semiannual written reports that identify:
    - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
    - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
    - c. any corrective actions taken to eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
  - (4) The quarterly deviation (excursion) reports and semiannual reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:  
PM<sub>10</sub> emissions shall not exceed 0.644 lb/hr and 2.820 tons/yr for P004.  
PM<sub>10</sub> emissions shall not exceed 0.322 lb/hr and 1.410 tons/yr for P006.

Applicable Compliance Method:

The short term PM<sub>10</sub> emission limitations were set equal to the potential to emit from these emission units. Compliance with the short term PM<sub>10</sub> emissions limitations is assumed since they are set equal to the potential to emit provided compliance with the terms and conditions of this permit is achieved. The potential to emit was calculated as follows:

Because the hoods on the grinders/sanders (P004 and P006) are integral and close-fitting to the equipment, the capture efficiency is assumed to be 95% for these EUs.

i. P004:

The maximum production rate per the permit application is 20 composite plastic sheets per hour. Each sheet is 3 ft x 8 ft = 24 ft<sup>2</sup>. The sander takes off 1/16 inch thickness (thk) = 0.0052 ft. The volume of material removed per hour = 20 sheets/hr x 24 ft<sup>2</sup>/sheet x 0.0052 ft = 2.496 ft<sup>3</sup>/hr.

The density of the dust, determined by collecting and weighing a sample in a box of known volume, is 17.8 lb/ft<sup>3</sup>. Therefore,

$$\text{PM}_{10} \text{ emissions before controls} = 2.496 \text{ ft}^3/\text{hr} \times 17.8 \text{ lb/ft}^3 = 44.429 \text{ lb/hr}$$

Assuming a hood capture efficiency of 95%, and a building capture efficiency of 90%, the fugitive PM<sub>10</sub> escaping the building is:

$$\text{Fugitive PM}_{10} = (44.429 \text{ lb/hr}) \times (1.0 - 0.95) \times (1.0 - 0.90) = 0.222 \text{ lb/hr}$$

Using the hood capture efficiency of 95%, and a baghouse efficiency of 99.0%, the controlled PM<sub>10</sub> leaving the baghouse exhaust attributed to P004 is:

$$\text{Stack PM}_{10} = (44.43 \text{ lb/hr}) \times (0.95) \times (1.0 - 0.99) = 0.422 \text{ lb/hr}$$

$$\begin{aligned} \text{Total PM}_{10} \text{ emissions} &= \text{Stack emissions} + \text{Fugitive emissions} \\ &= 0.422 \text{ lb/hr} + 0.222 \text{ lb/hr} \end{aligned}$$

$$\text{Total PM}_{10} \text{ from P004} = 0.644 \text{ lb/hr}$$

ii. P006:

The maximum production rate per the application is 8 composite plastic sheets per hour. Each sheet is 5 ft x 6 ft = 30 ft<sup>2</sup>. The sander takes off 1/16 inch thk = 0.0052 ft. The volume of material removed per hour = 8 sheets/hr x 30 ft<sup>2</sup>/sheet x 0.0052 ft = 1.248 ft<sup>3</sup>/hr.

The density of the dust, determined by collecting and weighing a sample in a box of known volume, is 17.8 lb/ft<sup>3</sup>.



$$\text{PM}_{10} \text{ emissions before controls} = 1.248 \text{ ft}^3/\text{hr} \times 17.8 \text{ lb}/\text{ft}^3 = 22.214 \text{ lb}/\text{hr}$$

Assuming a hood capture efficiency of 95%, and a building capture efficiency of 90%, the fugitive  $\text{PM}_{10}$  escaping the building is:

$$\text{Fugitive PM}_{10} = (22.214 \text{ lb}/\text{hr}) \times (1.0 - 0.95) \times (1.0 - 0.90) = 0.111 \text{ lb}/\text{hr}$$

Using the hood capture efficiency of 95%, and a baghouse efficiency of 99.0%, the controlled  $\text{PM}_{10}$  leaving the baghouse exhaust attributed to P006 is:

$$\text{Stack PM}_{10} = (22.214 \text{ lb}/\text{hr}) \times (0.95) \times (1.0 - 0.99) = 0.211 \text{ lb}/\text{hr}$$

$$\begin{aligned} \text{Total PM}_{10} \text{ emissions} &= \text{Stack emissions} + \text{Fugitive emissions} \\ &= 0.211 \text{ lb}/\text{hr} + 0.111 \text{ lb}/\text{hr} \end{aligned}$$

$$\text{Total PM}_{10} \text{ from P006} = 0.322 \text{ lb}/\text{hr}$$

The ton per year emissions limitations for P004 and P006 were developed by multiplying the short-term allowable  $\text{PM}_{10}$  emission limitations by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emissions limitations, compliance shall also be shown with the annual emissions limitations.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 51, Appendix M, Methods 201 or 201A. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

b. Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 0% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

c. Emission Limitation

Visible emissions of fugitive dust leaving the building shall not exceed 0% opacity as a 3-minute average.



Applicable Compliance Method

If required, compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

d. Emission Limitation:

The particulate emissions limitation pursuant to OAC rule 3745-17-11(A) is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

Applicable Compliance Method:

These emissions units are similar process units in close proximity to each other and therefore paragraph (A)(3) of OAC rule 3745-17-11 requires that they must be grouped together in order to determine compliance with the particulate emissions limitations in Figure II of the appendix of this rule. The combined total uncontrolled mass rates calculated in f)(1)a. above is used to enter Figure II as follows:

$$\begin{aligned} \text{Uncontrolled particulate from P004} &= 44.429 \text{ lb/hr} \\ \text{Uncontrolled particulate from P006} &= 22.214 \text{ lb/hr} \\ \hline \text{P004 + P006} &= 66.643 \text{ lb/hr} \end{aligned}$$

From the formula given with Figure II, the maximum allowable particulate emissions rate,  $A = 0.5782 \times U^{0.6456}$  lb/hr, where U = the combined uncontrolled particulate emissions rate = 66.643 lb/hr, therefore:

$$\text{Maximum allowable particulate emissions } A = 0.5782 \times 66.643^{0.6456} = 8.699 \text{ lb/hr}$$

The allowable particulate emissions pursuant to OAC rule 3745-31-05(A)(3) in b)(1)a. is:

$$\begin{aligned} \text{for P004} &= 0.644 \text{ lb/hr, and} \\ \text{for P006} &= 0.322 \text{ lb/hr} \\ \hline \text{Total} &= 0.966 \text{ lb/hr} \end{aligned}$$

The allowable particulate of 8.699 lb/hr found from Fig II is therefore shown to be less stringent than the 0.966 lb/hr combined allowable particulate emissions pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-17-11(A) also requires compliance with the allowable particulate emissions using Table I of the appendix to this rule.

i. For P004:

The maximum process weight rate, P, for P004 is:

$$20 \text{ sheets/hr} \times 70 \text{ lb/sheet} \times \text{ton}/2000\text{lb} = 0.7 \text{ tons/hr}$$



From the formula in Table I of the appendix of OAC rule 3745-17-11, the allowable particulate emissions (E) =  $4.10 (P)^{0.67}$  lb/hr for  $0.05 < (P) \leq 30$ . Therefore:

$$\text{allowable particulate emissions (E)} = 4.10 (0.7)^{0.67} = 3.228 \text{ lb/hr}$$

The allowable particulate emissions of 3.228 lb/hr found from Table I is therefore shown to be less stringent than the 0.644 lb/hr emissions limitation established pursuant to OAC rule 3745-31-05(A)(3) for P004.

ii. For P006:

The maximum process weight rate, P, for P006 is:

$$8 \text{ sheets/hr} \times 87.5 \text{ lb/sheet} \times \text{ton}/2000\text{lb} = 0.35 \text{ tons/hr}$$

From the formula in Table I of the appendix of OAC rule 3745-17-11, the allowable particulate emissions (E) =  $4.10 (P)^{0.67}$  lb/hr for  $0.05 < (P) \leq 30$ . Therefore:

$$\text{allowable particulate emissions (E)} = 4.10 (0.35)^{0.67} = 2.029 \text{ lb/hr}$$

The allowable particulate emissions of 2.029 lb/hr found from Table I is therefore shown to be less stringent than the 0.322 lb/hr emissions limitation established pursuant to OAC rule 3745-31-05(A)(3) for P006.

g) Miscellaneous Requirements

(1) None.