

Facility ID: 1318007355 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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

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

[Go to Part II for Emissions Unit K003](#)

[Go to Part II for Emissions Unit K004](#)

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

Facility ID: 1318007355 Emissions Unit ID: K003 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>
Adhesive Coated Cast Vinyl Film (Coating Line #2)	OAC 3745-31-05 (PTI No. 13-3057)	6.1 lbs/hr VOC including cleanup, 15.22 tons per year VOC.

**2. Additional Terms and Conditions**

- (a) The thermal incinerator shall operate with a capture efficiency of at least 95% and a destruction efficiency of at least 95%. The control equipment shall be operated any time this emissions unit is operated.

**B. Operational Restrictions**

1. The minimum combustion chamber exhaust gas temperature of the thermal incinerators shall be maintained at or above 1500 degrees Fahrenheit except during startup and shutdown.
2. This emissions unit shall operate no more than 4992 hours per year as stated in PTI # 13-3057. A log book of actual operation hours per day shall be kept to demonstrate compliance with this restriction.

**C. Monitoring and/or Record Keeping Requirements**

1. Ritrama Duramark shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. Accuracy for each thermocouple, monitor and recorder shall be guaranteed by the manufacturer to be within plus or minus one percent of the temperature being measured or plus or minus five degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

Ritrama Duramark shall collect and record the following information each day for the control equipment:  
 A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emission unit; and  
 The average temperature of the exhaust gases from the thermal incinerator during each of the 8 3-hour blocks of the time during the day.

**D. Reporting Requirements**

1. Ritrama Duramark shall submit to the Bureau of Air Pollution Control, Agency 13, quarterly summaries of the following records:  
 Logs of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emission unit; and  
 All three-hour blocks of the time during which the average temperature of the exhaust gases was less than 1500 degrees Fahrenheit.  
 These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.
2. Ritrama Duramark shall submit reports in the following manner:  
 Reports shall be submitted to the Cleveland Division of the Environment, Bureau of Air Pollution Control, 1925 St. Clair Avenue, Cleveland, OH 44114 (Cleveland DOE, BAPC) ; and  
 Except as otherwise may be provided in the terms and conditions for this emission unit, quarterly written reports shall be submitted of: a) any deviations (excursions) from 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. The reports shall be submitted by January 31, April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarter.

**E. Testing Requirements**

1. 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 after permit issuance and 6 months prior to permit renewal.  
 The emission testing shall be conducted to demonstrate compliance with the capture efficiency and the destruction efficiency and mass emission limitation for VOC.  
 The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates. VOC: Methods 24, 25A and 204F of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.  
 The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or the approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time (s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s). Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

**F. Miscellaneous Requirements**

1. A copy of this Terms and Condition shall be posted on or near the emission unit.

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

Facility ID: 1318007355 Emissions Unit ID: K004 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>
Adhesive Coated Cast Vinyl Film (Coating Line #2)	OAC 3745-31-05 (PTI No. 13-3112)	6.1 lbs/hr VOC including cleanup

1.0 lb/hr PM

**2. Additional Terms and Conditions**

- (a) The thermal incinerator shall operate with a capture efficiency of at least 95% and a destruction efficiency of at least 95%. The control equipment shall be operated any time this emissions unit is operated.

**B. Operational Restrictions**

1. The minimum combustion chamber exhaust gas temperature of the thermal incinerators shall be maintained at or above 1500 degrees Fahrenheit except during startup and shutdown.
2. This emissions unit shall operate no more than 7000 hours per year as stated in PTI # 13-3112. A log book of actual operation hours per day shall be kept to demonstrate compliance with this restriction.

**C. Monitoring and/or Record Keeping Requirements**

1. Ritrama Duramark shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emission unit is in operation. Units shall be in degrees Fahrenheit. Accuracy for each thermocouple, monitor and recorder shall be guaranteed by the manufacturer to be within plus or minus one percent of the temperature being measured or plus or minus five degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

Ritrama Duramark shall collect and record the following information each day for the control equipment:

A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emission unit; and

The average temperature of the exhaust gases from the thermal incinerator during each of the 8 3-hour blocks of the time during the day.

**D. Reporting Requirements**

1. Ritrama Duramark shall submit to the Bureau of Air Pollution Control, Agency 13, quarterly summaries of the following records:

Logs of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emission unit; and

All three-hour blocks of the time during which the average temperature of the exhaust gases was less than 1500 degrees Fahrenheit.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. Ritrama Duramark shall submit reports in the following manner:

Reports shall be submitted to the Cleveland Division of the Environment, Bureau of Air Pollution Control, 1925 St. Clair Avenue, Cleveland, OH 44114 (Cleveland DOE, BAPC) ; and

Except as otherwise may be provided in the terms and conditions for this emission unit, quarterly written reports shall be submitted of: a) any deviations (excursions) from 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. The reports shall be submitted by January 31, April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarter.

**E. Testing Requirements**

1. 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 after permit issuance and 6 months prior to permit renewal.

The emission testing shall be conducted to demonstrate compliance with the capture efficiency and the destruction efficiency and mass emission limitation VOC and the mass emission limitation for PM.

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates. VOC: Methods 24, 25A and 204F of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. PM: Method 5, 40 CFR Part 60, Appendix A

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or the approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time (s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

F. **Miscellaneous Requirements**

1. A copy of this Terms and Condition shall be posted on or near the emission unit.