



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
MEDINA COUNTY**

**CERTIFIED MAIL**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.  
Center

**Application No: 16-01972**

**DATE: 4/3/2001**

ACCEL Group Inc  
Robert J. Mangus  
325 Quadral Dr  
Wadsworth, OH 44281-9571

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

A handwritten signature in cursive script that reads "Thomas G. Rigo".

Thomas G. Rigo  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

ARAQMD



**Permit To Install  
Terms and Conditions**

**Issue Date: 4/3/2001  
Effective Date: 4/3/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 16-01972

Application Number: 16-01972  
APS Premise Number: 1652100086  
Permit Fee: **\$800**  
Name of Facility: ACCEL Group Inc  
Person to Contact: Robert J. Mangus  
Address: 325 Quadral Dr  
Wadsworth, OH 44281-9571

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**325 Quadral Dr  
Wadsworth, Ohio**

Description of proposed emissions unit(s):  
**Chapter 31 Modifications to panel laminating line, adhesive booth # 1, adhesive booth # 2, and hand wipe line.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- 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 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 appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

#### **3. Records Retention Requirements**

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.

#### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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 party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

**10. 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.

**11. 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).

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the

ACCEL Group Inc  
PTI Application: **16-01972**  
**Issued: 4/3/2001**

Facility ID: **1652100086**

permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. 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 this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

| <u>Pollutant</u>    | <u>Tons Per Year</u> |
|---------------------|----------------------|
| VOC                 | 90.88                |
| HAP                 | 23.73                |
| INDIVIDUAL HAP 9.76 | 9.76                 |

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>                                                                                                          |
|---------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Panel laminating line with reciprocating spray guns and electric drying oven (modification) | OAC rule 3745-31-05(A)(3)<br><br>OAC rule 3745-31-05(D)<br>Synthetic Minor to avoid Title V and to avoid Prevention of Significant Deterioration (PSD)<br><br>OAC rule 3745-21-07(G)(2) | See A.2.a through A.2.c, and C.5 below.<br><br>See A.2.d, and B.2 through B.7 below.<br><br>Exempt from the requirements of this rule pursuant to term B.1 below. |

**2. Additional Terms and Conditions**

- 2.a Volatile organic compound emissions for emissions unit R001 shall not exceed 42.3 pounds per hour, nor 63.45 tons per year.
- 2.b Acetone emissions for emissions unit R001 shall not exceed 42.3 pounds per hour, nor 61.83 tons per year.
- 2.c The volatile organic compound content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 2.82 pounds per gallon, as applied.
- 2.d The combined annual emissions from the entire facility (emissions units R001, R002,

R003, and R004) shall not exceed the following as rolling, 12-month summations:

90.88 tons of volatile organic compounds (VOC);  
23.73 tons of all hazardous air pollutants (HAP); and  
9.76 tons of any individual HAP.

**B. Operational Restrictions**

1. The permittee shall not employ any photochemically reactive materials, as defined in OAC 3745-21-01(C)(5), in this emissions unit.
2. The maximum annual adhesive usage for emissions unit R001 shall not exceed 45,000 gallons, based upon a rolling, 12-month summation of the adhesive usage.
3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the maximum allowable adhesive usage specified in the following table:

| <b>month(s)</b> | <b>Maximum Allowable Adhesive Usage for R001 only (gallons)</b> |
|-----------------|-----------------------------------------------------------------|
| 1               | 3,750                                                           |
| 1-2             | 7,500                                                           |
| 1-3             | 11,250                                                          |
| 1-4             | 15,000                                                          |
| 1-5             | 18,750                                                          |
| 1-6             | 22,500                                                          |
| 1-7             | 26,250                                                          |
| 1-8             | 30,000                                                          |
| 1-9             | 33,750                                                          |
| 1-10            | 37,500                                                          |
| 1-11            | 41,250                                                          |
| 1-12            | 45,000                                                          |

4. After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual adhesive usage limitation for emissions unit R001 shall be based upon a rolling, 12-month summation of the adhesive usage for emissions unit R001, in gallons.

5. The total allowable usage [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10\* TPY for any single HAP and 25\* TPY for any combination of HAPs, based upon rolling, 12-month summations.
6. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

| <b>month(s)</b> | <b>Entire Facility Maximum Allowable Cumulative Usage of Individual HAP (tons)</b> | <b>Entire Facility Maximum Allowable Cumulative Usage of Combined HAP (tons)</b> |
|-----------------|------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| 1               | 0.81                                                                               | 1.98                                                                             |
| 1-2             | 1.63                                                                               | 3.96                                                                             |
| 1-3             | 2.44                                                                               | 5.93                                                                             |
| 1-4             | 3.25                                                                               | 7.91                                                                             |
| 1-5             | 4.01                                                                               | 9.89                                                                             |
| 1-6             | 4.88                                                                               | 11.87                                                                            |
| 1-7             | 5.69                                                                               | 13.84                                                                            |
| 1-8             | 6.51                                                                               | 15.82                                                                            |
| 1-9             | 7.32                                                                               | 17.80                                                                            |
| 1-10            | 8.13                                                                               | 19.78                                                                            |
| 1-11            | 8.95                                                                               | 21.75                                                                            |
| 1-12            | 9.76                                                                               | 23.73                                                                            |

7. After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

\* This assumes that the HAPs emitted are the same as the amount of HAPs used, since all HAPs used evaporate.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and cleanup material employed at this facility.

2. The permittee shall maintain records, on a monthly basis, for emissions unit R001:
  - a. the name and identification number of each adhesive, thinner, and cleanup material employed;
  - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
  - c. the total VOC content, in pounds of VOC per gallon, of each adhesive, thinner, and cleanup material employed; and
  - d. the calculated total VOC emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
3. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the adhesive usage for each month; and
  - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the adhesive usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative adhesive usage for each calendar month.

4. The permittee shall, on a monthly basis, calculate and record for the entire facility (R001, R002, R003, and R004) the VOC usage rates from all adhesives, thinners, and cleanup materials employed, in tons.
5. The permit to install for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropyl alcohol

TLV (mg/m3): 491.3

Maximum Hourly Emission Rate (lbs/hr): 50

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 3,934

MAGLC (ug/m3): 11,698

6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

7. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall notify the Director (the Akron Regional Air Quality Management District) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron Regional Air Quality Management District) within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports which specify the following:
  - a. VOC emissions, in tons, for R001;
  - b. adhesive usage, in gallons, for R001; and
  - c. VOC, total HAP and individual HAP emissions, in tons, for R001, R002, R003, and R004.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in Permit to Install #16-01972 shall be determined in accordance with the following methods:

- a. Emission Limitation:

42.3 pounds per hour, and 63.45 tons per year VOC

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the maximum weight percent of solvent in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the

Emissions Unit ID: **R001**

pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the VOC content by the adhesive usage limit of 45,000 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

**b.** Emission Limitation:

42.3 pounds per hour, and 61.83 tons per year of acetone

Applicable Compliance Method:

The OC content is calculated by multiplying the organic solvent content of the adhesive by the volume percentage of the organic compound component by the density of the organic compound component. Compliance with the pound per hour limitation shall be determined by multiplying the OC content in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the OC content by the adhesive usage limit of 45,000 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

**c.** Emission Limitation:

90.88 TPY VOC for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.2, C.3, and in C.4 for emissions unit R001; and in C.2, C.4, and C.5 for emissions units R002, R003, and R004.

**d.** Emission Limitation:

23.73 TPY of all HAPs for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

No HAPs are used in R001. Therefore, no recordkeeping is applicable for HAPs in this emissions unit. Compliance with the combined HAPs limitations for the entire facility shall be based on the recordkeeping requirements for emissions units R002, R003, and R004.

e. Emission Limitation:

9.76 TPY of any individual HAP for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

No HAPs are used in R001. Therefore, no recordkeeping is applicable for HAPs in this emissions unit. Compliance with the individual HAPs limitations for the entire facility shall be based on the recordkeeping requirements for emissions units R002, R003, and R004.

2. Compliance with Operational Restriction B.2 in Permit to Install #16-1972 shall be determined in accordance with the following method:

a. Operational Restriction:

The maximum annual adhesive usage for emissions unit R001 shall not exceed 45,000 gallons, based upon a rolling, 12-month summation of the adhesive usage.

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.3.

## F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1382, as issued on September 8, 1994 and as modified on January 27, 1999.
2. The following terms and conditions are federally enforceable, pursuant to OAC rule 3745-35-07: A.1, A.2.c, A.2.d, B, C.1, C.2, C.3, C.4, D, E, and F.1

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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 booth #1 (modification)              | OAC rule 3745-31-05(A)(3)                                                                                             | See A.2.a through A.2.e, and C.7 below.                               |
|                                               | OAC rule 3745-31-05(D)<br>Synthetic Minor to avoid Title V and to avoid Prevention of Significant Deterioration (PSD) | See A.2.f, and B.2 through B.7 below.                                 |
|                                               | OAC rule 3745-21-07(G)(2)                                                                                             | Exempt from the requirements of this rule pursuant to term B.1 below. |

**2. Additional Terms and Conditions**

- 2.a Volatile organic compound emissions for emissions unit R002 shall not exceed 3.96 pounds per hour, nor 6.19 tons per year.
- 2.b Acetone emissions for emissions unit R002 shall not exceed 3.96 pounds per hour, nor 4.03 tons per year.
- 2.c Hexane emissions for emissions unit R002 shall not exceed 3.12 pounds per hour, nor 4.88 tons per year.
- 2.d Toluene emissions for emissions unit R002 shall not exceed 0.72 pounds per hour, nor 1.13 tons per year.

**2.e** The volatile organic compound content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 3.3 pounds per gallon, as applied.

**2.f** The combined annual emissions from the entire facility (emissions units R001, R002, R003, and R004) shall not exceed the following as rolling, 12-month summations:

90.88 tons of volatile organic compounds (VOC);  
23.73 tons of all hazardous air pollutants (HAP); and  
9.76 tons of any individual HAP.

## **B. Operational Restrictions**

1. The permittee shall not employ any photochemically reactive materials, as defined in OAC 3745-21-01(C)(5), in this emissions unit.
2. The maximum annual adhesive usage for emissions unit R002 shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the adhesive usage.
3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the maximum allowable adhesive usage specified in the following table:

| <b>month(s)</b> | <b>Maximum Allowable Adhesive Usage for R002 only (gallons)</b> |
|-----------------|-----------------------------------------------------------------|
| 1               | 313                                                             |
| 1-2             | 625                                                             |
| 1-3             | 938                                                             |
| 1-4             | 1,250                                                           |
| 1-5             | 1,563                                                           |
| 1-6             | 1,875                                                           |
| 1-7             | 2,188                                                           |
| 1-8             | 2,500                                                           |
| 1-9             | 2,813                                                           |
| 1-10            | 3,125                                                           |
| 1-11            | 3,438                                                           |
| 1-12            | 3,750                                                           |

4. After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual adhesive usage limitation for emissions unit R002 shall be based upon

a rolling, 12-month summation of the adhesive usage for emissions unit R002, in gallons.

5. The total allowable usage [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10\* TPY for any single HAP and 25\* TPY for any combination of HAPs, based upon rolling, 12-month summations.
6. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

| <b>month(s)</b> | <b>Entire Facility Maximum Allowable Cumulative Usage of Individual HAP (tons)</b> | <b>Entire Facility Maximum Allowable Cumulative Usage of Combined HAP (tons)</b> |
|-----------------|------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| 1               | 0.81                                                                               | 1.98                                                                             |
| 1-2             | 1.63                                                                               | 3.96                                                                             |
| 1-3             | 2.44                                                                               | 5.93                                                                             |
| 1-4             | 3.25                                                                               | 7.91                                                                             |
| 1-5             | 4.01                                                                               | 9.89                                                                             |
| 1-6             | 4.88                                                                               | 11.87                                                                            |
| 1-7             | 5.69                                                                               | 13.84                                                                            |
| 1-8             | 6.51                                                                               | 15.82                                                                            |
| 1-9             | 7.32                                                                               | 17.80                                                                            |
| 1-10            | 8.13                                                                               | 19.78                                                                            |
| 1-11            | 8.95                                                                               | 21.75                                                                            |
| 1-12            | 9.76                                                                               | 23.73                                                                            |

7. After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

\* This assumes that the HAPs emitted are the same as the amount of HAPs used, since all HAPs used evaporate.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and cleanup material employed at this facility.

2. The permittee shall maintain records, on a monthly basis, for emissions unit R002:
  - a. the name and identification number of each adhesive, thinner, and cleanup material employed;
  - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
  - c. the total VOC content, in pounds of VOC per gallon, of each adhesive, thinner, and cleanup material employed;
  - d. the calculated total VOC emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
  
3. The permittee shall maintain records regarding HAPs emissions, on a monthly basis, for emissions unit R002:
  - a. the name and identification number of each adhesive, thinner, and cleanup material employed;
  - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
  - c. the total hexane content, in pounds of hexane per gallon, of each adhesive, thinner, and cleanup material employed;
  - d. the total toluene content, in pounds of toluene per gallon, of each adhesive, thinner, and cleanup material employed;
  - e. the calculated total hexane emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
  - f. the calculated total toluene emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
  
4. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the adhesive usage for each month; and
  - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the adhesive usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative adhesive usage for each calendar month.

5. The permittee shall, on a monthly basis, calculate and record for the entire facility (R001, R002, R003, and R004) the VOC usage rates from all adhesives, thinners, and cleanup materials employed, in tons.
6. The permittee shall, on a monthly basis, calculate and record for the facility (R002, R003, and R004) the individual HAP usage rates, and combined HAP usage rates, from all adhesives, thinners, and cleanup materials employed, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a line-by-line basis.

This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

7. The permit to install for this emissions unit (R002) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane

TLV (mg/m<sup>3</sup>): 176.2

Maximum Hourly Emission Rate (lbs/hr): 25

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 3,456

MAGLC (ug/m<sup>3</sup>): 4,195

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air

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"Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
8. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall notify the Director (the Akron Regional Air Quality Management District) in

writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron Regional Air Quality Management District) within 30 days following the end of the calendar month.

2. The permittee shall submit annual reports which specify the following:
  - a. VOC, hexane and toluene emissions, in tons, for R002;
  - b. adhesive usage, in gallons, for R002; and
  - c. VOC, total HAP and individual HAP emissions, in tons, for R001, R002, R003, and R004.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in Permit to Install #16-01972 shall be determined in accordance with the following methods:

- a. Emission Limitation:

3.96 pounds per hour, and 6.19 tons per year VOC

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the maximum weight percent of solvent in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the VOC content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

- b. Emission Limitation:

3.96 pounds per hour, and 4.03 tons per year of acetone

Applicable Compliance Method:

The OC content is calculated by multiplying the organic solvent content of the adhesive by the volume percentage of the organic compound component by the density of the organic compound component. Compliance with the pound per hour limitation shall be determined by multiplying the OC content in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the OC content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

**c.** Emission Limitation:

3.12 pounds per hour, and 4.88 tons per year hexane

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be demonstrated by multiplying the maximum weight percent of hexane in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the hexane content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

**d.** Emission Limitation:

0.72 pounds per hour, and 1.13 tons per year toluene

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be demonstrated by multiplying the maximum weight percent of toluene in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the toluene content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

**e.** Emission Limitation:

90.88 TPY VOC for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.2, C.3, and in C.4 for emissions unit R001; and in C.2, C.4, and C.5 for emissions units R002, R003, and R004.

**f.** Emission Limitation:

23.73 TPY of all HAPs for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.3, C.4, and in C.6 for emissions units R002, R003, and R004.

**g.** Emission Limitation:

9.76 TPY of any individual HAP for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.3, C.4, and in C.6 for emissions units R002, R003, and R004.

**2.** Compliance with Operational Restriction B.2 in Permit to Install #16-1972 shall be determined in accordance with the following method:

**a.** Operational Restriction:

The maximum annual adhesive usage for emissions unit R002 shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the adhesive usage.

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.4.

**F. Miscellaneous Requirements**

- 1.** This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1382, as issued on September 8, 1994 and as modified on January 27, 1999.
- 2.** The following terms and conditions are federally enforceable, pursuant to OAC rule 3745-35-07: A.1, A.2.e, A.2.f, B, C.1, C.2, C.3, C.4, D, E, and F.1

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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 booth #2 (modification)              | OAC rule 3745-31-05(A)(3)                                                                                             | See A.2.a through A.2.e, and C.7 below.                               |
|                                               | OAC rule 3745-31-05(D)<br>Synthetic Minor to avoid Title V and to avoid Prevention of Significant Deterioration (PSD) | See A.2.f, and B.2 through B.7 below.                                 |
|                                               | OAC rule 3745-21-07(G)(2)                                                                                             | Exempt from the requirements of this rule pursuant to term B.1 below. |

**2. Additional Terms and Conditions**

- 2.a Volatile organic compound emissions for emissions unit R003 shall not exceed 3.96 pounds per hour, nor 6.19 tons per year.
- 2.b Acetone emissions for emissions unit R003 shall not exceed 3.96 pounds per hour, nor 4.03 tons per year.
- 2.c Hexane emissions for emissions unit R003 shall not exceed 3.12 pounds per hour, nor 4.88 tons per year.
- 2.d Toluene emissions for emissions unit R003 shall not exceed 0.72 pounds per hour, nor

1.13 tons per year.

- 2.e** The volatile organic compound content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 3.3 pounds per gallon, as applied.
- 2.f** The combined annual emissions from the entire facility (emissions units R001, R002, R003, and R004) shall not exceed the following as rolling, 12-month summations:
- 90.88 tons of volatile organic compounds (VOC);  
 23.73 tons of all hazardous air pollutants (HAP); and  
 9.76 tons of any individual HAP.

## B. Operational Restrictions

- The permittee shall not employ any photochemically reactive materials, as defined in OAC 3745-21-01(C)(5), in this emissions unit.
- The maximum annual adhesive usage for emissions unit R003 shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the adhesive usage.
- To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the maximum allowable adhesive usage specified in the following table:

| month(s) | Maximum Allowable Adhesive Usage for R003 only (gallons) |
|----------|----------------------------------------------------------|
| 1        | 313                                                      |
| 1-2      | 625                                                      |
| 1-3      | 938                                                      |
| 1-4      | 1,250                                                    |
| 1-5      | 1,563                                                    |
| 1-6      | 1,875                                                    |
| 1-7      | 2,188                                                    |
| 1-8      | 2,500                                                    |
| 1-9      | 2,813                                                    |
| 1-10     | 3,125                                                    |
| 1-11     | 3,438                                                    |
| 1-12     | 3,750                                                    |

4. After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual adhesive usage limitation for emissions unit R003 shall be based upon a rolling, 12-month summation of the adhesive usage for emissions unit R003, in gallons.
5. The total allowable usage [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10\* TPY for any single HAP and 25\* TPY for any combination of HAPs, based upon rolling, 12-month summations.
6. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

| <b>month(s)</b> | <b>Entire Facility Maximum Allowable Cumulative Usage of Individual HAP (tons)</b> | <b>Entire Facility Maximum Allowable Cumulative Usage of Combined HAP (tons)</b> |
|-----------------|------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| 1               | 0.81                                                                               | 1.98                                                                             |
| 1-2             | 1.63                                                                               | 3.96                                                                             |
| 1-3             | 2.44                                                                               | 5.93                                                                             |
| 1-4             | 3.25                                                                               | 7.91                                                                             |
| 1-5             | 4.01                                                                               | 9.89                                                                             |
| 1-6             | 4.88                                                                               | 11.87                                                                            |
| 1-7             | 5.69                                                                               | 13.84                                                                            |
| 1-8             | 6.51                                                                               | 15.82                                                                            |
| 1-9             | 7.32                                                                               | 17.80                                                                            |
| 1-10            | 8.13                                                                               | 19.78                                                                            |
| 1-11            | 8.95                                                                               | 21.75                                                                            |
| 1-12            | 9.76                                                                               | 23.73                                                                            |

7. After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

\* This assumes that the HAPs emitted are the same as the amount of HAPs used, since all HAPs used evaporate.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and

cleanup material employed at this facility.

2. The permittee shall maintain records, on a monthly basis, for emissions unit R003:
  - a. the name and identification number of each adhesive, thinner, and cleanup material employed;
  - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
  - c. the total VOC content, in pounds of VOC per gallon, of each adhesive, thinner, and cleanup material employed;
  - d. the calculated total VOC emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
  
3. The permittee shall maintain records regarding HAPs emissions, on a monthly basis, for emissions unit R003:
  - a. the name and identification number of each adhesive, thinner, and cleanup material employed;
  - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
  - c. the total hexane content, in pounds of hexane per gallon, of each adhesive, thinner, and cleanup material employed;
  - d. the total toluene content, in pounds of toluene per gallon, of each adhesive, thinner, and cleanup material employed;
  - e. the calculated total hexane emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
  - f. the calculated total toluene emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
  
4. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the adhesive usage for each month; and
  - b. beginning after the first 12 calendar months of operation following the issuance of this

permit, the rolling, 12-month summation of the adhesive usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative adhesive usage for each calendar month.

5. The permittee shall, on a monthly basis, calculate and record for the entire facility (R001, R002, R003, and R004) the VOC usage rates from all adhesives, thinners, and cleanup materials employed, in tons.
6. The permittee shall, on a monthly basis, calculate and record for the facility (R002, R003, and R004) the individual HAP usage rates, and combined HAP usage rates, from all adhesives, thinners, and cleanup materials employed, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a line-by-line basis.

This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

7. The permit to install for this emissions unit (R003) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane

TLV (mg/m<sup>3</sup>): 176.2

Maximum Hourly Emission Rate (lbs/hr): 25

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 3,456

MAGLC (ug/m<sup>3</sup>): 4,195

Physical changes to or changes in the method of operation of the emissions unit after its

installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
8. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall notify the Director (the Akron Regional Air Quality Management District) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron Regional Air Quality Management District) within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports which specify the following:
  - a. VOC, hexane and toluene emissions, in tons, for R003;
  - b. adhesive usage, in gallons, for R003; and
  - c. VOC, total HAP and individual HAP emissions, in tons, for R001, R002, R003, and R004.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in Permit to Install #16-01972 shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
3.96 pounds per hour, and 6.19 tons per year VOC  
  
Applicable Compliance Method:  
  
Compliance with the pound per hour limitation shall be determined by multiplying the maximum weight percent of solvent in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.  
  
To comply with the ton per year limitation, multiply the VOC content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.
  - b. Emission Limitation:  
  
3.96 pounds per hour, and 4.03 tons per year of acetone

**Applicable Compliance Method:**

The OC content is calculated by multiplying the organic solvent content of the adhesive by the volume percentage of the organic compound component by the density of the organic compound component. Compliance with the pound per hour limitation shall be determined by multiplying the OC content in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the OC content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

**c.** Emission Limitation:

3.12 pounds per hour, and 4.88 tons per year hexane

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be demonstrated by multiplying the maximum weight percent of hexane in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the hexane content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

**d.** Emission Limitation:

0.72 pounds per hour, and 1.13 tons per year toluene

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be demonstrated by multiplying the maximum weight percent of toluene in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the toluene content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

**e.** Emission Limitation:

90.88 TPY VOC for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.2, C.3, and in C.4 for emissions unit R001; and in C.2, C.4, and C.5 for emissions units R002, R003, and R004.

**f.** Emission Limitation:

23.73 TPY of all HAPs for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.3, C.4, and in C.6 for emissions units R002, R003, and R004.

**g.** Emission Limitation:

9.76 TPY of any individual HAP for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.3, C.4, and in C.6 for emissions units R002, R003, and R004.

**2.** Compliance with Operational Restriction B.2 in Permit to Install #16-1972 shall be determined in accordance with the following method:

**a.** Operational Restriction:

The maximum annual adhesive usage for emissions unit R002 shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the adhesive usage.

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.4.

**F. Miscellaneous Requirements**

- 1.** This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1382, as issued on September 8, 1994 and as modified on January 27, 1999.
- 2.** The following terms and conditions are federally enforceable, pursuant to OAC rule 3745-35-07: A.1, A.2.e, A.2.f, B, C.1, C.2, C.3, C.4, D, E, and F.1

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]****A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>              |
|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|
| Finished Parts Wiping<br>(new addition)       | OAC rule 3745-31-05(A)(3)                                                                                                   | See A.2.a through A.2.e, and C.7 below.                               |
|                                               | OAC rule 3745-31-05(D)<br>Synthetic Minor to avoid Title V<br>and to avoid Prevention of<br>Significant Deterioration (PSD) | See A.2.f, and B.2 through B.7 below.                                 |
|                                               | OAC rule 3745-21-07(G)(2)                                                                                                   | Exempt from the requirements of this rule pursuant to term B.1 below. |

**2. Additional Terms and Conditions**

- 2.a** Volatile organic compound emissions for emissions unit R004 shall not exceed 10.04 pounds per hour, nor 15.05 tons per year.
- 2.b** Toluene emissions for emissions unit R004 shall not exceed 2.07 pounds per hour, nor 3.11 tons per year.
- 2.c** Methyl Ethyl Ketone (MEK) emissions for emissions unit R004 shall not exceed 4.73 pounds per hour, nor 7.09 tons per year.
- 2.d** Methyl Isobutyl Ketone (MIBK) emissions for emissions unit R004 shall not exceed 1.01 pounds per hour, nor 1.51 tons per year.

- 2.e The volatile organic compound content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 6.69 pounds per gallon, as applied.
- 2.f The combined annual emissions from the entire facility (emissions units R001, R002, R003, and R004) shall not exceed the following as rolling, 12-month summations:  
  - 90.88 tons of volatile organic compounds (VOC);
  - 23.73 tons of all hazardous air pollutants (HAP); and
  - 9.76 tons of any individual HAP.

**B. Operational Restrictions**

- 1. The permittee shall not employ any photochemically reactive materials, as defined in OAC 3745-21-01(C)(5), in this emissions unit.
- 2. The maximum annual adhesive usage for emissions unit R004 shall not exceed 4,500 gallons, based upon a rolling, 12-month summation of the adhesive usage.
- 3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the maximum allowable adhesive usage specified in the following table:

| month(s) | Maximum Allowable Adhesive Usage for R004 only (gallons) |
|----------|----------------------------------------------------------|
| 1        | 375                                                      |
| 1-2      | 750                                                      |
| 1-3      | 1,125                                                    |
| 1-4      | 1,500                                                    |
| 1-5      | 1,875                                                    |
| 1-6      | 2,250                                                    |
| 1-7      | 2,625                                                    |
| 1-8      | 3,000                                                    |
| 1-9      | 3,375                                                    |
| 1-10     | 3,750                                                    |
| 1-11     | 4,125                                                    |
| 1-12     | 4,500                                                    |

- 4. After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual adhesive usage limitation for emissions unit R004 shall be based upon

a rolling, 12-month summation of the adhesive usage for emissions unit R004, in gallons.

5. The total allowable usage [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10\* TPY for any single HAP and 25\* TPY for any combination of HAPs, based upon rolling, 12-month summations.
6. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

| <b>month(s)</b> | <b>Entire Facility Maximum Allowable Cumulative Usage of Individual HAP (tons)</b> | <b>Entire Facility Maximum Allowable Cumulative Usage of Combined HAP (tons)</b> |
|-----------------|------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| 1               | 0.81                                                                               | 1.98                                                                             |
| 1-2             | 1.63                                                                               | 3.96                                                                             |
| 1-3             | 2.44                                                                               | 5.93                                                                             |
| 1-4             | 3.25                                                                               | 7.91                                                                             |
| 1-5             | 4.01                                                                               | 9.89                                                                             |
| 1-6             | 4.88                                                                               | 11.87                                                                            |
| 1-7             | 5.69                                                                               | 13.84                                                                            |
| 1-8             | 6.51                                                                               | 15.82                                                                            |
| 1-9             | 7.32                                                                               | 17.80                                                                            |
| 1-10            | 8.13                                                                               | 19.78                                                                            |
| 1-11            | 8.95                                                                               | 21.75                                                                            |
| 1-12            | 9.76                                                                               | 23.73                                                                            |

7. After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

\* This assumes that the HAPs emitted are the same as the amount of HAPs used, since all HAPs used evaporate.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and cleanup material employed at this facility.
2. The permittee shall maintain records, on a monthly basis, for emissions unit R004:

- a. the name and identification number of each adhesive, thinner, and cleanup material employed;
  - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
  - c. the total VOC content, in pounds of VOC per gallon, of each adhesive, thinner, and cleanup material employed;
  - d. the calculated total VOC emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
3. The permittee shall maintain records regarding HAPs emissions, on a monthly basis, for emissions unit R004:
  - a. the name and identification number of each adhesive, thinner, and cleanup material employed;
  - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
  - c. the total toluene content, in pounds of toluene per gallon, of each adhesive, thinner, and cleanup material employed;
  - d. the total MEK content, in pounds of MEK per gallon, of each adhesive, thinner, and cleanup material employed;
  - e. the MIBK content, in pounds of MIBK per gallon, of each adhesive, thinner, and cleanup material employed; and
  - f. the calculated total toluene emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
  - g. the calculated total MEK emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
  - h. the calculated total MIBK emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
4. The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the adhesive usage for each month; and
- b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the adhesive usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative adhesive usage for each calendar month.

5. The permittee shall, on a monthly basis, calculate and record for the entire facility (R001, R002, R003, and R004) the VOC usage rates from all adhesives, thinners, and cleanup materials employed, in tons.
6. The permittee shall, on a monthly basis, calculate and record for the facility (R002, R003, and R004) the individual HAP usage rates, and combined HAP usage rates, from all adhesives, thinners, and cleanup materials employed, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a line-by-line basis.

This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

7. The permit to install for this emissions unit (R004) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: light aliphatic solvent naphtha

TLV (mg/m<sup>3</sup>): 52.4

Maximum Hourly Emission Rate (lbs/hr): 9

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1,238

MAGLC (ug/m3): 1,247.6

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

8. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that

show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall notify the Director (the Akron Regional Air Quality Management District) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron Regional Air Quality Management District) within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports which specify the following:
  - a. VOC, toluene, MEK, and MIBK emissions, in tons, for R004;
  - b. adhesive usage, in gallons, for R004; and
  - c. VOC, total HAP and individual HAP emissions, in tons, for R001, R002, R003, and R004.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations in Permit to Install #16-01972 shall be determined in accordance with the following methods:
  - a. Emission Limitation:

10.04 pounds per hour, and 15.05 tons per year VOC

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the maximum weight percent of solvent in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the VOC content by the adhesive usage limit of 4,500 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

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**b.** Emission Limitation:

2.07 pounds per hour, and 3.11 tons per year toluene

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the maximum weight percent of toluene in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the toluene content by the adhesive usage limit of 4,500 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

c. Emission Limitation:

4.73 pounds per hour, and 7.09 tons per year MEK

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the maximum weight percent of MEK in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the MEK content by the adhesive usage limit of 4,500 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

d. Emission Limitation:

1.01 pounds per hour, and 1.51 tons per year MIBK

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the maximum weight percent of MIBK in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the MIBK content by the adhesive usage limit of 4,500 gallons per year, and divide by the conversion factor of 2000 pounds

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per ton.

- e.** Emission Limitation:

90.88 TPY VOC for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.2, C.3, and in C.4 for emissions unit R001; and in C.2, C.4, and C.5 for emissions units R002, R003, and R004.
- f.** Emission Limitation:

23.73 TPY of all HAPs for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.3, C.4, and in C.6 for emissions units R002, R003, and R004.
- g.** Emission Limitation:

9.76 TPY of any individual HAP for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.3, C.4, and in C.6 for emissions units R002, R003, and R004.
- 2.** Compliance with Operational Restriction B.2 in Permit to Install #16-1972 shall be determined in accordance with the following method:

  - a.** Operational Restriction:

The maximum annual adhesive usage for emissions unit R004 shall not exceed 4,500 gallons, based upon a rolling, 12-month summation of the adhesive usage.

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.4.

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ACCEL Group Inc

PTI Application: 16-01073

**Issued**

Facility ID: 1652100086

Emissions Unit ID: R004

**F. Miscellaneous Requirements**

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1382, as issued on September 8, 1994 and as modified on January 27, 1999.
2. The following terms and conditions are federally enforceable, pursuant to OAC rule 3745-35-07: A.1, A.2.e, A.2.f, B, C.1, C.2, C.3, C.4, D, E, and F.1