

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **16-02220**

A. Source Description

Saint-Gobain Performance Plastics Corporation (SGPPL) in Mantua, Ohio is a manufacturer of extruded hoses and tubing. We also manufacture some products with a braided reinforcement. The manufacture of braided/reinforced hoses requires the use of VOC or HAP-based adhesives.

The manufacture of extruded hoses will emit particulate matter and volatile organic chemicals (VOCs). For the purposes of potential-to-emit (PTE) calculations, VOCs emitted from the extruders are assumed to be hazardous air pollutants (HAPs).

The construction of reinforced tubing requires the addition of small amounts of adhesives during the braiding. One of the products currently used by SGPPL is a VOC (n-methyl pyrrolidone, NMP) at 91% by weight and the other adhesive product, moisture-cured urethane (MCU) containing methylene chloride at 20% by weight. These products are and can be used on any of 13 braiders identified as MR11 units and either of two beam servers. A third product is a water-based adhesive with no VOCs.

B. Facility Emissions and Attainment Status

Per the revised PTE table (attached), emissions of concern with the potential to trigger Title V reporting are HAPs. The PTE for methylene chloride (single HAP) is 47.68 tons per year (tpy). The Title V threshold is 10 tpy. The aggregate HAPs facility PTE, including the extruders, is 49.88 tpy. The Title V threshold for a combination of HAPs is 25 tpy. Please reference the attached tables.

Pollutant: Methylene Chloride

Sources: MR11 Machines and Beam Servers

Actual Emissions(*1): 0.484 – 4.54 tons per year (years 1994 – 2001)

Potential Emissions: 47.68 tpy

Restricted PTE Request: 9.95 tpy

(*1) This value reports the range of methylene chloride contained in the MCU purchases for the years 1994 through 2001. For this presentation, we are assuming that all methylene chloride is emitted at the facility, while in actuality, some MCU adhesive is sent off-site for treatment/disposal.

Pollutant: Combined HAPs

Sources: MR11 Machines, Beam Servers and Extruders

Actual Emissions: 4.23 tons (Year 2001)

Potential Emissions: 49.88

Restricted PTE Request (*2): 24 tpy

(*2) By restricting the PTE of methylene chloride to 9.95 tpy, the PTE for combined HAPs based on current operations is 12.15 tpy.

C. Source Emissions

Given that the source of the methylene chloride is a single adhesive (moisture-cured urethane, MCU), SGPPL proposes to limit the total amount of MCU consumed at the facility in any rolling 12-months to 99,500 pounds. This will limit our actual and PTE to 9.95 tons of methylene chloride (99,500 lbs. MCU x 20% MeCl / 2000 lb/t = 9.95 tpy MeCl).

The attached PTE table for primary sources and the facility present information relative to this synthetic minor request, specifically for a single HAP (methylene chloride) and aggregate HAPs.

SGPPL is requesting a facility-wide limitation for single HAP and aggregate HAPs which will give us operational flexibility between the MR11 machines and the beam servers and braiders. (Currently and historically, the Karg and Wardwell Braiders have not used HAP-adhesives.) The record-keeping burdens for tracking the usage of MCU on individual machines will be burdensome and given that total HAP adhesive consumption for the facility is readily known (releases from purchasing into production), the amount of HAPs emitted is also known.

SGPPL also proposes to restrict the operating hours of the Beam Servers when running specific products in order to comply with OAC 3745-21-07(G), regarding limiting the emissions of organic material from an individual source to 40 pounds per day. Operating time is monitored and recorded, real time, on form MF-06, Overall Equipment Effectiveness. This form will be used to document compliance with the requested time limitations (19.5 hours per day run time for each emission unit for specific products) to meet this rule.

D. Conclusion

By controlling and tracking the amount of HAP adhesive usage, SGPPL can effectively control and limit the amount of hazardous air pollutants emitted from our facility to remain a synthetic minor and avoid Title V permitting and federal MACT standards.

In addition, in order to comply with OAC 3745-21-07(G), SGPPL will restrict hours of operation of the Beam Servers to 19.5 hours per day when running the "worst case" emitters as presented in the attached PTE Calculations attachment and the revised PTE Table.

Saint-Gobain Performance Plastics Corporation's Mantua, Ohio facility believes that these activities will allow and enable us to operate below Title V and MACT thresholds.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
PORTAGE COUNTY**

CERTIFIED MAIL

Application No: 16-02220

DATE: 10/8/2002

Saint Gobain Performance Plastics
Jesse Nelson
10585 Main St
Mantua, OH 44255

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$6000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

ARAQMD

Akron Met Area Trans Study

WV

PA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 16-02220

Application Number: 16-02220
APS Premise Number: 1667050017
Permit Fee: **To be entered upon final issuance**
Name of Facility: Saint Gobain Performance Plastics
Person to Contact: Jesse Nelson
Address: 10585 Main St
Mantua, OH 44255

Location of proposed air contaminant source(s) [emissions unit(s)]:

**10585 Main St
Mantua, Ohio**

Description of proposed emissions unit(s):

Application of Reinforcing Braid to Hoses and Belts, Fifteen (15) Applicators.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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

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lead to such sanctions

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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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(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>
Organic Material	41.0
Methylene Chloride	9.95
Combined HAP	24.0

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>
P003 - SO1 Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.	OAC rule 3745-31-05(A)(3)	*6.1 lbs/hr OC 40.0 lbs/day OC *7.3 tons per year OC * The lbs OC/hour and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.
Server S01	OAC rule 3745-21-07(G)(2)	See 2.a. below
	OAC rule 3745-35-07(B)(1)	See 2.b. below

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- 2.b The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit.

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Emissions Unit ID: **P003**

- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

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Emissions Unit ID: P003

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. The permittee has agreed to accept limitations on daily operating hours to keep the emissions unit daily OC emissions below 40 pounds per day, and the facility-wide MeCl emission rate to less than 9.95 tons per year.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - c. The number of gallons of each coating and photochemically reactive cleanup material

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Facility ID: 1667050017

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employed each hour of the day.

- d. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.

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- e. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day .

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

- 2. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.4) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;
 - d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials (sum of term C.2.b X C.2.c), in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
- 3. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
- 4. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.

D. Reporting Requirements

- 1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, individual HAPs, and combined HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.

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Emissions Unit ID: **P003**

Issued: To be entered upon final issuance

2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the controlled organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual controlled organic compound emissions for each such day.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
4. These deviation (excursion) reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

6.1 pounds per hour OC

40 pounds per day

7.3 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 40 pounds per day of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and 2.

Compliance with the 7.3 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and 2 and using the following equation:

$$40 \text{ lbs/day} \times 365 \text{ days/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 7.3 \text{ tons/yr OC allowable}$$

b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.2 and using the following equation:

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.2.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

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Emissions Unit ID: **P003**

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TLV (mg/m³): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,031

MAGLC (ug/m³): 4,131

* This was modeled for emissions units P003 through P017 combined.

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, 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 TLV value specified above;
- 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.

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.

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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>
P004 - SO2 Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers. Server S01	OAC rule 3745-31-05(A)(3)	*6.1 lbs/hr OC 40.0 lbs/day OC *7.3 tons per year OC * The lbs OC/hour and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.
	OAC rule 3745-21-07(G)(2)	See 2.a. below
	OAC rule 3745-35-07(B)(1)	See 2.b. below

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- 2.b The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section

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Emissions Unit ID: **P004**

B of this permit.

- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

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Emissions Unit ID: P004

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. The permittee has agreed to accept limitations on daily operating hours to keep the emissions unit daily OC emissions below 40 pounds per day, and the facility-wide MeCl emission rate to less than 9.95 tons per year.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - c. The number of gallons of each coating and photochemically reactive cleanup material

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employed each hour of the day.

- d. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.

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- e. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day .

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.4) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;
 - d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials (sum of term C.2.b X C.2.c), in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
3. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
4. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, individual HAPs, and combined HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.

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2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the controlled organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual controlled organic compound emissions for each such day.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
4. These deviation (excursion) reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

6.1 pounds per hour OC

40 pounds per day OC

7.3 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 40 pounds per day of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and 2.

Compliance with the 7.3 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and 2 and using the following equation:

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40 lbs/day x 365 days/yr x 1 ton/2000 lbs = 7.3 tons/yr OC allowable.

b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.2 and using the following equation:

$Ls \times Aa \times H \times Me$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

feet/hr x lbs/feet x hrs/day x lbs of MeCl/lb of adhesive applied = lbs of MeCl/day

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

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Pollutant: methylene chloride

TLV (mg/m³): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,031

MAGLC (ug/m³): 4,131

* This was modeled for emissions units P003 through P017 combined.

* This was modeled for emissions units P003 through P017 combined.

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, 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 TLV value specified above;
- 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.

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:"

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- 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.

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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>
P005 - MR11-1 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*. * The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.
	OAC rule 3745-21-07(G)(2)	See 2.a. below.
	OAC rule 3745-35-07(B)(1)	See 2.b. below.

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- 2.b The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit.

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- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;

- d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.
2. The permittee shall submit deviation (excursion) reports which include the following information:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.83 pound per hour OC
3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

$$0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$$

b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation.:

$$Ls \times Aa \times H \times Me$$

- Ls = Line speed in feet per hour
- Aa = Adhesive application rate in pounds of adhesive applied per foot
- H = Hours operated during the day
- MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

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Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m³): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,031

MAGLC (ug/m³): 4,131

* This was modeled for emissions units P003 through P017 combined.

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, 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 TLV value specified above;
- 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.

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.);

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- 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.

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>
P006 - MR11-2 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*
	OAC rule 3745-21-07(G)(2)	See 2.a. below
	OAC rule 3745-35-07(B)(1)	See 2.b. below

* The lb OC/hour and lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

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- 2.b** The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit.
- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;

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- d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,

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- e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
3. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.
2. The permittee shall submit deviation (excursion) reports which include the following information:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

0.83 pound per hour OC

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3.6 tons per year OC

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Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

$$0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$$

b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

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F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install using data from the

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permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m3): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031

MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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, 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 TLV value specified above;
- 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.

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.

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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>
P007 - MR11-3 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*
	OAC rule 3745-21-07(G)(2)	* The lb OC/hour, lbs OC/day, andTPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.
	OAC rule 3745-35-07(B)(1)	See 2.a. below See 2.b. below

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- 2.b The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section

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Issued: To be entered upon final issuance

Emissions Unit ID: **P007**

B of this permit.

- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

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Issued: To be entered upon final issuance

Emissions Unit ID: P007

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;

- d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.
2. The permittee shall submit deviation (excursion) reports which include the following information:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.83 pound per hour OC

3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

$$0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$$

b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide

24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:.

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions

unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

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Emissions Unit ID: P007

Issued: To be entered upon final issuance

Pollutant: methylene chloride

TLV (mg/m³): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,031

MAGLC (ug/m³): 4,131

* This was modeled for emissions units P003 through P017 combined.

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, 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 TLV value specified above;
- 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.

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.);

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Issued: To be entered upon final issuance

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- 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.

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>
P008 - MR11-4 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*
	OAC rule 3745-21-07(G)(2)	* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.
	OAC rule 3745-35-07(B)(1)	See 2.a. below
		See 2.b. below

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission

limitation established pursuant to OAC rule 3745-31-05.

- 2.b** The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit.
- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

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Issued: To be entered upon final issuance

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;

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- d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.
2. The permittee shall submit deviation (excursion) reports which include the following information:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

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Facility ID: 1667050017

Emissions Unit ID: P008

- a. Emission Limitation:
 - 0.83 pound per hour OC
 - 3.6 tons per year OC

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PTI

Emissions Unit ID: P008

Issued: To be entered upon final issuance

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$$

b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

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PTI /

Emissions Unit ID: **P008**

Issued: To be entered upon final issuance

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m³): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,031

MAGLC (ug/m³): 4,131

* This was modeled for emissions units P003 through P017 combined.

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, 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 TLV value specified above;
- 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.).

Emissions Unit ID: **P008**

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.

Issued: To be entered upon final issuance

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>
P009 - MR11-5 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC* * The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.
	OAC rule 3745-21-07(G)(2)	See 2.a. below
	OAC rule 3745-35-07(B)(1)	See 2.b. below

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- 2.b The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit.

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Issue

Facility ID: 1667050017

Emissions Unit ID: P009

- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

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Emissions Unit ID: P009

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;

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- d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.
2. The permittee shall submit deviation (excursion) reports which include the following information:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be

Saint Gobain Performance Plastics

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Issue

Facility ID: 1667050017

Emissions Unit ID: P009

determined in accordance with the following methods:

a. Emission Limitation:

0.83 pounds per hour OC

3.6 tons per year OC

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PTI

Emissions Unit ID: P009

Issued: To be entered upon final issuance

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$$

b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C. Compliance shall be demonstrated through record keeping using the following equation.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m³): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,031

MAGLC (ug/m³): 4,131

* This was modeled for emissions units P003 through P017 combined.

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, 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 TLV value specified above;
- 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.).

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Facility ID: 1667050017

Emissions Unit ID: P009

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:"

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- 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.

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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>
P010 - MR11-6 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*
	OAC rule 3745-21-07(G)(2)	* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.
	OAC rule 3745-35-07(B)(1)	See 2.a. below. See 2.b. below.

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- 2.b The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section

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B of this permit.

- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;

- d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.
2. The permittee shall submit deviation (excursion) reports which include the following information:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and

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individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.83 pound per hour OC

3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$$

- b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide

24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:.

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/foot} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs MeCl/day}$$

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A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m3): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031

MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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, 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

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Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;

- 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.

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.

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>
P011 - MR11-7 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*
	OAC rule 3745-21-07(G)(2)	* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.
	OAC rule 3745-35-07(B)(1)	See 2.a. below. See 2.b. below.

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- 2.b The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit.

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Emissions Unit ID: **P011**

- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

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Emissions Unit ID: P011

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;

- d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.
2. The permittee shall submit deviation (excursion) reports which include the following information:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

Saint Gobain Performance Plastics
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Facility ID: 1667050017

Emissions Unit ID: P011

- a. Emission Limitation:
 - 0.83 pound per hour OC
 - 3.6 tons per year OC

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Emissions Unit ID: P011

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Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$0.83 \text{ lb/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable}$$

b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

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Emissions Unit ID: **P011**

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F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m3): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031

MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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, 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 TLV value specified above;
- 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.).

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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.

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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>
P012 - MR11-8 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*
	OAC rule 3745-21-07(G)(2)	See 2.a. below.
	OAC rule 3745-35-07(B)(1)	See 2.b. below.

* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- 2.b The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit.

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Facility ID: 1667050017

Emissions Unit ID: P012

- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

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Emissions Unit ID: P012

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;

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- d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.
2. The permittee shall submit deviation (excursion) reports which include the following information:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District

which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.83 pound per hour OC

3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$0.83 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC}$$

- b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide

24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

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Emissions Unit ID: **P012**

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs MeCl/day}$$

Saint

PTI /

Emissions Unit ID: **P012**

Issued: To be entered upon final issuance

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m3): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031

MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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, 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 TLV value specified above;

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- 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

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- 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.

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.

Issued: To be entered upon final issuance

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>
P013 - MR11-9 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*
	OAC rule 3745-21-07(G)(2)	* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.
	OAC rule 3745-35-07(B)(1)	See 2.a. below. See 2.b. below.

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- 2.b The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section

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PTI /

Issued: To be entered upon final issuance

Emissions Unit ID: **P013**

B of this permit.

- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Saint

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: P013

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;

- d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.
2. The permittee shall submit deviation (excursion) reports which include the following information:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

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Issued: To be entered upon final issuance

Emissions Unit ID: **P013**

- a. Emission Limitation:
 - 0.83 pound per hour OC
 - 3.6 tons per year OC

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PTI

Emissions Unit ID: P013

Issued: To be entered upon final issuance

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$0.83 \text{ lb/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable}$$

b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m³): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,031

MAGLC (ug/m³): 4,131

* This was modeled for emissions units P003 through P017 combined.

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, 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 TLV value specified above;
- 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

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Emissions Unit ID: **P013**

Issued: To be entered upon final issuance

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.

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>
P014 - MR11-10 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*
	OAC rule 3745-21-07(G)(2)	See 2.a. below.
	OAC rule 3745-35-07(B)(1)	See 2.b. below.

* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- 2.b The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit.

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PTI /

Emissions Unit ID: **P014**

Issued: To be entered upon final issuance

- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

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Emissions Unit ID: P014

Issued: To be entered upon final issuance

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;

- d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.
2. The permittee shall submit deviation (excursion) reports which include the following information:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

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PTI**

Emissions Unit ID: **P014**

Issued: To be entered upon final issuance

- a. Emission Limitation:
 - 0.83 pound per hour OC
 - 3.6 tons per year OC

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PTI

Emissions Unit ID: P014

Issued: To be entered upon final issuance

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$0.83 \text{ lb/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$$

b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs MeCl/lb of adhesive

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

Saint

PTI /

Emissions Unit ID: **P014**

Issued: To be entered upon final issuance

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m3): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031

MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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, 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 TLV value specified above;
- 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.).

Emissions Unit ID: **P014**

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.

Issued: To be entered upon final issuance

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>
P015 - MR11-11 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*
	OAC rule 3745-21-07(G)(2)	* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.
	OAC rule 3745-35-07(B)(1)	See 2.a. below. See 2.b. below.

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- 2.b The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section

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Facility ID: 1667050017

Emissions Unit ID: **P015**

B of this permit.

- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

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PTI

Emissions Unit ID: P015

Issued: To be entered upon final issuance

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;

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Issued: To be entered upon final issuance

- d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.
2. The permittee shall submit deviation (excursion) reports which include the following information:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and

individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.

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3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.83 pound per hour OC
3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$0.83 \text{ lb/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$$

- b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation.:

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

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H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

feet/hr x lbs/feet x hrs/day x lbs of MeCl/lb of adhesive applied = lbs of MeCl/day

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Issued: To be entered upon final issuance

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m3): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031

MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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, 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 TLV value specified above;

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- 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

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Issued: To be entered upon final issuance

- 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.

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.

Issued: To be entered upon final issuance

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>
P016 - MR11-12 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*
	OAC rule 3745-21-07(G)(2)	* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.
	OAC rule 3745-35-07(B)(1)	See 2.a. below.
		See 2.b. below.

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- 2.b The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section

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PTI /

Issued: To be entered upon final issuance

Emissions Unit ID: **P016**

B of this permit.

- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Saint

PTI

Emissions Unit ID: P016

Issued: To be entered upon final issuance

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;

- d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.
2. The permittee shall submit deviation (excursion) reports which include the following information:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

Saint

PTI /

Issued: To be entered upon final issuance

Emissions Unit ID: **P016**

a. Emission Limitation:

0.83 pound per hour OC

3.6 tons per year OC

Saint

PTI

Emissions Unit ID: **P016**

Issued: To be entered upon final issuance

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$0.83 \text{ lb/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$$

b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m³): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,031

MAGLC (ug/m³): 4,131

* This was modeled for emissions units P003 through P017 combined.

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, 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 TLV value specified above;
- 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

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Emissions Unit ID: **P016**

Issued: To be entered upon final issuance

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.

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>
P017 - MR11-13 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*
	OAC rule 3745-21-07(G)(2)	* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.
	OAC rule 3745-35-07(B)(1)	See 2.a. below.
		See 2.b. below.

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
- 2.b The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit.

Saint

PTI /

Issued: To be entered upon final issuance

Emissions Unit ID: **P017**

- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Saint

PTI

Emissions Unit ID: P017

Issued: To be entered upon final issuance

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of MeCl (Tons)</u>	<u>Maximum Allowable Cumulative Emissions combined HAPs (Tons)</u>
1	1.8	4
1-2	3.6	8
1-3	4.5	10
1-4	5.4	12
1-5	6.3	14
1-6	7.2	16
1-7	8.1	18
1-8	9.0	20
1-9	9.9	22
1-10	9.95	24
1-11	9.95	24
1-12	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;

- d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.
2. The permittee shall submit deviation (excursion) reports which include the following information:

The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

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PTI /

Issued: To be entered upon final issuance

Emissions Unit ID: **P017**

a. Emission Limitation:

0.83 pound per hour OC

3.6 tons per year OC

Saint

PTI

Emissions Unit ID: P017

Issued: To be entered upon final issuance

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$0.83 \text{ lb/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$$

b. Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C and using the following equation:

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs MeCl/lb of adhesive

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

Saint

PTI /

Emissions Unit ID: **P017**

Issued: To be entered upon final issuance

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m³): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,031

MAGLC (ug/m³): 4,131

* This was modeled for emissions units P003 through P017 combined.

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, 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 TLV value specified above;
- 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.).

Emissions Unit ID: **P017**

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.

NEW SOURCE REVIEW FORM B

PTI Number: 16-02220 Facility ID: 1667050017

FACILITY NAME Saint Gobain Performance Plastics

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses and Belts, Fifteen (15) Applicators. CITY/TWP Mantua

SIC CODE 3052 SCC CODE 3-01-018-09 EMISSIONS UNIT ID P003

EMISSIONS UNIT DESCRIPTION Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment		2.2	6.05 lbs/hr	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	MeCl		0.15	6.0 lbs/hr	3.9

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with the terms and conditions of this permit, and limited emissions rates.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: methylene chloride

NEW SOURCE REVIEW FORM B

PTI Number: 16-02220

Facility ID: 1667050017

FACILITY NAME Saint Gobain Performance Plastics

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses CITY/TWP Mantua

Emissions Unit ID: **P017**

SIC CODE 3052

SCC CODE 3-01-018-09

EMISSIONS UNIT ID P004

EMISSIONS UNIT DESCRIPTION Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment		7.3	6.05 lbs/hr	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	MeCl		3.9	6.0 lbs/hr	3.9

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit, and limited emissions rates.IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: methylene chloride

NEW SOURCE REVIEW FORM B

PTI Number: 16-02220

Facility ID: 1667050017

FACILITY NAME Saint Gobain Performance Plastics

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses CITY/TWP Mantua

Emissions Unit ID: P017

SIC CODE 3052

SCC CODE 3-01-018-09

EMISSIONS UNIT ID P005

EMISSIONS UNIT DESCRIPTION Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment			0.5 lbs/hr	2.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	MeCl			0.1 lbs/hr	0.15

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit, and limited emissions rates.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: methylene chloride

NEW SOURCE REVIEW FORM B

PTI Number: 16-02220

Facility ID: 1667050017

FACILITY NAME Saint Gobain Performance Plastics

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses CITY/TWP Mantua

Emissions Unit ID: **P017**SIC CODE 3052SCC CODE 3-01-018-09EMISSIONS UNIT ID P006

EMISSIONS UNIT DESCRIPTION Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment		2.2	0.5 lbs/hr	2.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	MeCl		0.15	0.1 lbs/hr	0.15

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit, and limited emissions rates.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? _____

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____IDENTIFY THE AIR CONTAMINANTS: methylene chloride

NEW SC

PTI Num

FACILITY

Emissions Unit ID: **P017** _____

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses and Belts, Fifteen (15) Applicators. CITY/TWP Mantua

SIC CODE 3052 SCC CODE 3-01-018-09 EMISSIONS UNIT ID P007

EMISSIONS UNIT DESCRIPTION Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment		2.2	0.5 lbs/hr	2.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	MeCl		0.15	0.1 lbs/hr	0.15

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with the terms and conditions of this permit, and limited emissions rates.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? _____

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: methylene chloride

NEW SOURCE REVIEW FORM B

PTI Number: 16-02220

Facility ID: 1667050017

FACILITY NAME Saint Gobain Performance Plastics

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses CITY/TWP Mantua

Emissions Unit ID: **P017**SIC CODE 3052SCC CODE 3-01-018-09EMISSIONS UNIT ID P008

EMISSIONS UNIT DESCRIPTION Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment		2.2	0.5 lbs/hr	2.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	MeCl		0.15	0.1 lbs/hr	0.15

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit, and limited emissions rates.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? _____

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____IDENTIFY THE AIR CONTAMINANTS: methylene chloride

NEW SOURCE REVIEW FORM B

PTI Number: 16-02220

Facility ID: 1667050017

FACILITY NAME Saint Gobain Performance Plastics

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses CITY/TWP Mantua

Emissions Unit ID: **P017**SIC CODE 3052SCC CODE 3-01-018-09EMISSIONS UNIT ID P009

EMISSIONS UNIT DESCRIPTION Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment		2.2	0.5 lbs/hr	2.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	MeCl		0.15	0.1 lbs/hr	0.15

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit, and limited emissions rates.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? _____

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____IDENTIFY THE AIR CONTAMINANTS: methylene chloride

NEW SOURCE REVIEW FORM B

PTI Number: 16-02220

Facility ID: 1667050017

FACILITY NAME Saint Gobain Performance Plastics

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses CITY/TWP Mantua

Emissions Unit ID: **P017**

SIC CODE 3052

SCC CODE 3-01-018-09

EMISSIONS UNIT ID P010

EMISSIONS UNIT DESCRIPTION Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment		2.2	0.5 lbs/hr	2.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	MeCl		0.15	0.1 lbs/hr	0.15

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit, and limited emissions rates.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? _____

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____IDENTIFY THE AIR CONTAMINANTS: methylene chloride

NEW SOURCE REVIEW FORM B

PTI Number: 16-02220

Facility ID: 1667050017

FACILITY NAME Saint Gobain Performance Plastics

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses CITY/TWP Mantua

Emissions Unit ID: **P017**

SIC CODE 3052

SCC CODE 3-01-018-09

EMISSIONS UNIT ID P011

EMISSIONS UNIT DESCRIPTION Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment		2.2	0.5 lbs/hr	2.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	MeCl		0.15	0.1 lbs/hr	0.15

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit, and limited emissions rates.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? _____

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____IDENTIFY THE AIR CONTAMINANTS: methylene chloride

NEW SC

PTI Num

FACILITY

Emissions Unit ID: **P017** _____

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses and Belts, Fifteen (15) Applicators. CITY/TWP Mantua

SIC CODE 3052 SCC CODE 3-01-018-09 EMISSIONS UNIT ID P012

EMISSIONS UNIT DESCRIPTION Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment		2.2	0.5 lbs/hr	2.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	MeCl		0.15	0.1 lbs/hr	0.15

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with the terms and conditions of this permit, and limited emissions rates.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? _____

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: methylene chloride

NEW SOURCE REVIEW FORM B

PTI Number: 16-02220

Facility ID: 1667050017

FACILITY NAME Saint Gobain Performance Plastics

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses CITY/TWP Mantua

Emissions Unit ID: **P017**

SIC CODE 3052

SCC CODE 3-01-018-09

EMISSIONS UNIT ID P013

EMISSIONS UNIT DESCRIPTION Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment		2.2	0.5 lbs/hr	2.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	MeCl		0.15	0.1 lbs/hr	0.15

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit, and limited emissions rates.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? _____

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____IDENTIFY THE AIR CONTAMINANTS: methylene chloride

NEW SOURCE REVIEW FORM B

PTI Number: 16-02220

Facility ID: 1667050017

FACILITY NAME Saint Gobain Performance Plastics

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses CITY/TWP Mantua

Emissions Unit ID: **P017**

SIC CODE 3052

SCC CODE 3-01-018-09

EMISSIONS UNIT ID P014

EMISSIONS UNIT DESCRIPTION Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment		2.2	0.5 lbs/hr	2.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	MeCl		0.15	0.1 lbs/hr	0.15

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit, and limited emissions rates.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? _____

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____IDENTIFY THE AIR CONTAMINANTS: methylene chloride

NEW SOURCE REVIEW FORM B

PTI Number: 16-02220 Facility ID: 1667050017

FACILITY NAME Saint Gobain Performance Plastics

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses CITY/TWP Mantua

Emissions Unit ID: P017

SIC CODE 3052 SCC CODE 3-01-018-09 EMISSIONS UNIT ID P015

EMISSIONS UNIT DESCRIPTION Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment		2.2	0.5 lbs/hr	2.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	MeCl		0.15	0.1 lbs/hr	0.15

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with the terms and conditions of this permit, and limited emissions rates.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: methylene chloride

NEW SOURCE REVIEW FORM B

PTI Number: 16-02220

Facility ID: 1667050017

FACILITY NAME Saint Gobain Performance Plastics

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses CITY/TWP Mantua

Emissions Unit ID: **P017**

SIC CODE 3052

SCC CODE 3-01-018-09

EMISSIONS UNIT ID P016

EMISSIONS UNIT DESCRIPTION Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment		2.2	0.5 lbs/hr	2.2
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	MeCl		0.15	0.1 lbs/hr	0.15

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit, and limited emissions rates.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? _____

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____IDENTIFY THE AIR CONTAMINANTS: methylene chloride

15 NEW SC

PTI Num

FACILITY

Emissions Unit ID: P017

FACILITY DESCRIPTION Application of Reinforcing Braid to Hoses and Belts, Fifteen (15) Applicators. CITY/TWP Mantua

SIC CODE 3052 SCC CODE 3-01-018-09 EMISSIONS UNIT ID P017

EMISSIONS UNIT DESCRIPTION Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Table with 6 columns: Pollutants, Air Quality Description, Actual Emissions Rate (Short Term Rate, Tons Per Year), and PTI Allowable (Short Term Rate, Tons Per Year). Rows include Particulate Matter, PM10, Sulfur Dioxide, Organic Compounds, Nitrogen Oxides, Carbon Monoxide, Lead, and Other: Air Toxics (MeCl).

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION? Compliance with the terms and conditions of this permit, and limited emissions rates.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: methylene chloride