



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
SUMMIT COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 16-02179

DATE: 4/4/2002

The Ruscoe Co Plant 2
Donald Popp
485 Kenmore Blvd
Akron, OH 44314-3858

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Very truly yours,

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

cc: USEPA

ARAQMD



**Permit To Install
Terms and Conditions**

**Issue Date: 4/4/2002
Effective Date: 4/4/2002**

FINAL PERMIT TO INSTALL 16-02179

Application Number: 16-02179
APS Premise Number: 1677010204
Permit Fee: **\$3200**
Name of Facility: The Ruscoe Co Plant 2
Person to Contact: Donald Popp
Address: 485 Kenmore Blvd
Akron, OH 44314-3858

Location of proposed air contaminant source(s) [emissions unit(s)]:
**219 E Miller Ave
Akron, Ohio**

Description of proposed emissions unit(s):
Various Sealant Mixers.

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 lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

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

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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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>
OC (Uncontrolled Potential)	187.0
VOC(Controlled)	33.8
MEK (Controlled)	30.6

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>
P018 - Sealant Mixer Coat-4 uncontrolled	OAC rule 3745-31-05(A)(3)	*1.4 pounds per hour OC *5.9 tons per year OC See 2.b. below 4.1 tons per year VOC 4.1 ton per year MEK * The OC emission includes the individual VOC and HAP emissions.
	OAC rule 3745-21-07(G)(2)	See 2.a. below.

2. Additional Terms and Conditions

- 2.a The requirements established under this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
- 2.b The OC hourly and annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.0022 pounds VOC per hour per pound of ingredients.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
 - a. the mixture's VOC emission rate in pounds of VOC per hour per pound of ingredients;
 - b. the mixture's MEK emission rate in pounds of MEK per hour per pound of ingredients;

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c 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:

1.4 pound per hour OC
4.1 tons per year VOC
4.1 tons per year of MEK

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant RMT Inc., based on stack testing conducted at the facility. 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.

- b. Operational Restriction:

0.0022 pounds VOC per hour per pound of ingredients

Applicable Compliance Method:

The operational restriction was requested by the permittee through their consultant RMT, Inc. Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P018) 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: Methyl Ethyl Ketone

TLV (mg/m³): 589.8 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 15.06*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,202.7

MAGLC (ug/m³): 14,042.3

* This was modeled for emissions units P018, P025, P028 through P033 combined and through two stacks.

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

Emissions Unit ID: P018

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.

2. 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>
P025 - Sealant Mixer Coat-13 controlled with a condenser estimated operating control efficiency 85%.	OAC rule 3745-31-05(A)(3)	*2.9 lbs. per hour OC *12.6 tons per year OC 1.4 tons per year VOC 1.3 ton per year MEK * The OC emission includes the individual VOC and HAP emissions
	OAC rule 3745-21-07(G)(2)	See 2.a. below

2. Additional Terms and Conditions

- 2.a The requirements established under this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
- 2.b The OC hourly and annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The temperature of the cooling water from the chiller, before entering the condenser, for any 3-hour block of time, shall not be greater than 55 degrees Fahrenheit, when the unit is in

operation.

2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.0021 pounds VOC per hour per pound of ingredients.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
 - a. the mixture's VOC emission rate in pounds of VOC per hour per pound of ingredients;
 - b. the mixture's MEK emission rate in pounds of MEK per hour per pound of ingredients;
2. The permittee shall maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day, that this emissions unit is in operation, and mixing a solvent containing material:

- a. A minimum of one temperature reading of the cooling water from the chiller during each of the 8 3-hour blocks of time during the day when the emissions unit is in operation.
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
2. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c 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:

2.9 pounds per hour OC
1.4 tons per year VOC
1.3 tons per year of MEK

Applicable Compliance Method:

The emission calculation was supplied by the permittee through their consultant RMT, Inc, based on stack testing conducted at the facility. 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.

- b. Operational Restriction:

0.0021 pounds VOC per hour per pound of ingredients

Applicable Compliance Method:

The operational restriction was requested by the permittee through their consultant RMT, Inc. Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P025) 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: Methyl Ethyl Ketone

TLV (mg/m³): 589.8 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 15.06*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,202.7

MAGLC (ug/m³): 14,042.3

* This was modeled for emissions units P018, P025, P028 through P033 combined and through two stacks.

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.

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Emissions Unit ID: **P025**

2. 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>
P028 - Sealant Mixer Coat-16 controlled with a condenser estimated operating control efficiency 85%.	OAC rule 3745-31-05(A)(3)	4.8 lbs per hour OC 20.6 tons per year OC 3.3 tons per year VOC 3.3 ton per year MEK
	OAC rule 3745-21-07(G)(2)	See 2.a. below.

2. Additional Terms and Conditions

- 2.a The requirements established under this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
- 2.b The OC hourly and annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.c For this emissions unit all OC emissions shall be considered VOC emissions.

B. Operational Restrictions

1. The temperature of the cooling water from the chiller, before entering the condenser, for any 3-hour block of time, shall not be greater than 55 degrees Fahrenheit, when the unit is in operation.

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Emissions Unit ID: **P028**

2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.0015 pounds VOC per hour per pound of ingredients.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
 - a. the mixture's VOC emission rate in pounds of VOC per hour per pound of ingredients;
 - b. the mixture's MEK emission rate in pounds of MEK per hour per pound of ingredients;
2. The permittee shall maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day that this emissions unit is in operation, and mixing a solvent containing material.

- a. A minimum of one temperature reading of the cooling water from the chiller during each of the 8 3-hour blocks of time during the day when the emissions unit is in operation.
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
2. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c 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:

4.8 pounds per hour OC
3.3 tons per year VOC
3.3 tons per year MEK

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant RMT, Inc, based on stack testing conducted at the facility. 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.

- b. Operational Restriction:

0.0015 pounds VOC per hour per pound of ingredients

Applicable Compliance Method:

The operational restriction was requested by the permittee through their consultant RMT, Inc. Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P028) 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: **P028**

Pollutant: Methyl Ethyl Ketone
TLV (mg/m³): 589.8 (Converted from the TWA)
Maximum Hourly Emission Rate (lbs/hr): 15.06*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,202.7
MAGLC (ug/m³): 14,042.3

* This was modeled for emissions units P018, P025, P028 through P033 combined and through two stacks.

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.

2. 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

- 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>
P029 - Sealant Mixer Coat-17 controlled with a condenser estimated operating control efficiency 85%.	OAC rule 3745-31-05(A)(3)	1.4 lbs per hour OC 5.9 tons per year OC
	OAC rule 3745-21-07(G)(2)	1.0 ton per year VOC See 2.a. below.

2. Additional Terms and Conditions

- The requirements established under this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
- The OC hourly and annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.
- For this emissions unit all OC emissions shall be considered VOC emissions.

B. Operational Restrictions

- The temperature of the cooling water from the chiller, before entering the condenser, for any 3-hour block of time, shall not be greater than 55 degrees Fahrenheit, when the unit is in operation.
- No sealant recipe shall be mixed in this unit with an emission rate greater than 0.0011 pounds

VOC per hour per pound of ingredients.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
 - a. the mixture's VOC emission rate in pounds of VOC per hour per pound of ingredients;
2. The permittee shall maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day that this emissions unit is in operation, and mixing a solvent containing material:

- a. A minimum of one temperature reading of the cooling water from the chiller during each of the 8 3-hour blocks of time during the day when the emissions unit is in operation.
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
2. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c 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:

1.4 pounds per hour OC

1.0 ton per year VOC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant RMT, Inc, based on stack testing conducted at the facility. 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.

b. Operational Restriction:

0.0011 pounds VOC per hour per pound of ingredients

Applicable Compliance Method:

The operational restriction was requested by the permittee through their consultant RMT, Inc. Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

None

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>
P030 - Sealant Mixer Coat-18 controlled with a condenser estimated operating control efficiency 85%.	OAC rule 3745-31-05(A)(3)	8.4 lbs per hour OC 36.7 tons per year OC 5.9 tons per year VOC 5.8 tons per year MEK
	OAC Rule 3745-21-07(G)(2)	See 2.a. below.

2. Additional Terms and Conditions

- 2.a The requirements established under this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
- 2.b The OC hourly and annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.c For this emissions unit all OC emissions shall be considered VOC emissions.

B. Operational Restrictions

1. The temperature of the cooling water from the chiller, before entering the condenser, for any 3-hour block of time, shall not be greater than 55 degrees Fahrenheit, when the unit is in operation.

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Emissions Unit ID: **P030**

2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.0016 pounds VOC per hour per pound of ingredients.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
 - a. the mixture's VOC emission rate in pounds of VOC per hour per pound of ingredients;
 - b. the mixture's MEK emission rate in pounds of MEK per hour per pound of ingredients;
2. The permittee shall maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day that this emissions unit is in operation, and mixing a solvent containing material:

- a. A minimum of one temperature reading of the cooling water from the chiller during each of the 8 3-hour blocks of time during the day when the emissions unit is in operation.
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
2. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c 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:

8.4 pounds per hour OC
5.9 tons per year VOC
5.8 tons per year of MEK

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant RMT, Inc, based on stack testing conducted at the facility. 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.

- b. Operational Restriction:

0.0016 pounds VOC per hour per pound of ingredients

Applicable Compliance Method:

The operational restriction was requested by the permittee through their consultant RMT, Inc. Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P030) 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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Facility ID: 1677010204

Emissions Unit ID: **P030**

Pollutant: Methyl Ethyl Ketone
TLV (mg/m³): 589.8 (Converted from the TWA)
Maximum Hourly Emission Rate (lbs/hr): 15.06*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,202.7
MAGLC (ug/m³): 14,042.3

* This was modeled for emissions units P018, P025, P028 through P033 combined and through two stacks.

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.

2. 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>
P031 - Sealant Mixer Coat -19, Uncontrolled	OAC rule 3745-31-05(A)(3)	0.5 pounds per hour OC 2.0 tons per year OC 2.0 tons per year VOC
	OAC rule 3745-21-07(G)(2)	See 2.a. below.

2. Additional Terms and Conditions

- 2.a The requirements established under this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).

Emissions Unit ID: P031

2.b The OC hourly and annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.

2.c For this emissions unit all OC emissions shall be considered VOC emissions.

B. Operational Restrictions

1. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00003 pounds VOC per hour per pound of ingredients.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
 - a. the mixture's VOC emission rate in pounds of VOC per hour per pound of ingredients;

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c 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:

0.5 pounds per hour OC
2.0 tons per year VOC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant RMT,

Inc, based on stack testing conducted at the facility. 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.

b. Operational Restriction:

0.00003 pounds VOC per hour per pound of ingredients

Applicable Compliance Method:

The operational restriction was requested by the permittee through their consultant RMT, Inc. Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P032 - Sealant Mixer Coat-20 controlled with a condenser estimated operating control efficiency 85%.	OAC rule 3745-31-05(A)(3)	14.3 pounds per hour OC 62.5 tons per year OC
	OAC rule 3745-21-07(G)(2)	10.0 tons per year VOC 9.9 ton per year MEK
		See 2.a. below.

2. Additional Terms and Conditions

- The requirements established under this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
- The OC hourly and annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.
- For this emissions unit all OC emissions shall be considered VOC emissions.

B. Operational Restrictions

- The temperature of the cooling water from the chiller, before entering the condenser, for any 3-hour block of time, shall not be greater than 55 degrees Fahrenheit, when the unit is in operation.

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Emissions Unit ID: **P032**

2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.0016 pounds VOC per hour per pound of ingredients.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
 - a. the mixture's VOC emission rate in pounds of VOC per hour per pound of ingredients;
 - b. the mixture's MEK emission rate in pounds of MEK per hour per pound of ingredients;
2. The permittee shall maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day that this emissions unit is in operation, and mixing a solvent containing material:

- a. A minimum of one temperature reading of the cooling water from the chiller during each of the 8 3-hour blocks of time during the day when the emissions unit is in operation.
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
2. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c 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:

14.3 pounds per hour OC
10.0 tons per year VOC
9.9 tons per year MEK

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant RMT, Inc, based on stack testing conducted at the facility. 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.

- b. Operational Restriction:

0.0016 pounds VOC per hour per pound of ingredients

Applicable Compliance Method:

The operational restriction was requested by the permittee through their consultant RMT, Inc. Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P032) 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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Facility ID: 1677010204

Emissions Unit ID: **P032**

Pollutant: Methyl Ethyl Ketone
 TLV (mg/m³): 589.8 (Converted from the TWA)
 Maximum Hourly Emission Rate (lbs/hr): 15.06*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,202.7
 MAGLC (ug/m³): 14,042.3

* This was modeled for emissions units P018, P025, P028 through P033 combined and through two stacks.

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.

2. 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>
P033 - Sealant Mixer Coat-21 controlled with a condenser estimated operating control efficiency 85%.	OAC rule 3745-31-05(A)(3)	9.4 pounds per hour OC 41.1 tons per year OC 6.6 ton per year VOC 6.6 ton per year MEK
	OAC rule 3745-21-07(G)(2)	See 2.a. below.

2. Additional Terms and Conditions

- 2.a The requirements established under this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
- 2.b The OC hourly and annual emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.c For this emissions unit all OC emissions shall be considered VOC emissions.

B. Operational Restrictions

1. The temperature of the cooling water from the chiller, before entering the condenser, for any 3-hour block of time, shall not be greater than 55 degrees Fahrenheit, when the unit is in operation.

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Facility ID: 1677010204

Emissions Unit ID: **P033**

2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.0013 pounds VOC per hour per pound of ingredients.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
 - a. the mixture's VOC emission rate in pounds of VOC per hour per pound of ingredients;
 - b. the mixture's MEK emission rate in pounds of MEK per hour per pound of ingredients;
2. The permittee shall maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day that this emissions unit is in operation, and mixing a solvent containing material:

- a. A minimum of one temperature reading of the cooling water from the chiller during each of the 8 3-hour blocks of time during the day when the emissions unit is in operation.
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
2. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c 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:

9.4 pounds per hour OC
6.6 ton per year VOC
6.6 tons per year MEK

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant RMT, Inc, based on stack testing conducted at the facility. 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.

- b. Operational Restriction:

0.0013 pounds VOC per hour per pound of ingredients

Applicable Compliance Method:

The operational restriction was requested by the permittee through their consultant RMT, Inc. Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P033) 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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PTI Application: 16-03170
Issued

Facility ID: 1677010204

Emissions Unit ID: **P033**

Pollutant: Methyl Ethyl Ketone
TLV (mg/m³): 589.8 (Converted from the TWA)
Maximum Hourly Emission Rate (lbs/hr): 15.06*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,202.7
MAGLC (ug/m³): 14,042.3

* This was modeled for emissions units P018, P025, P028 through P033 combined and through two stacks.

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.

2. 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.