



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

5/11/2016

Certified Mail

Ron Vanderpool
Guardian Manufacturing Company
302 Conwell Ave.
Willard, OH 44890-9525

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0339030016
Permit Number: P0119917
Permit Type: OAC Chapter 3745-31 Modification
County: Huron

Dear Permit Holder:

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

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

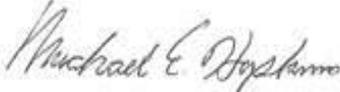
This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Guardian Manufacturing Company**

Facility ID: 0339030016
Permit Number: P0119917
Permit Type: OAC Chapter 3745-31 Modification
Issued: 5/11/2016
Effective: 5/11/2016



Division of Air Pollution Control
Permit-to-Install
for
Guardian Manufacturing Company

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Final Permit-to-Install
Guardian Manufacturing Company
Permit Number: P0119917
Facility ID: 0339030016
Effective Date: 5/11/2016

Authorization

Facility ID: 0339030016
Facility Description: Fabricated rubber products
Application Number(s): A0054596
Permit Number: P0119917
Permit Description: Chapter 31 modification permit to increase allowable hourly emission rates for dip rings P801, P802 and P804.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$600.00
Issue Date: 5/11/2016
Effective Date: 5/11/2016

This document constitutes issuance to:

Guardian Manufacturing Company
302 Conwell Ave.
Willard, OH 44890-9525

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

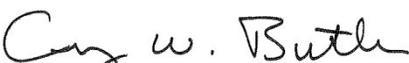
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0119917

Permit Description: Chapter 31 modification permit to increase allowable hourly emission rates for dip rings P801, P802 and P804.

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

Group Name: Rubber Glove Dip Ring Operations

Emissions Unit ID:	P801
Company Equipment ID:	P801
Superseded Permit Number:	P0105853
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P802
Company Equipment ID:	P802
Superseded Permit Number:	P0105853
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P804
Company Equipment ID:	P804
Superseded Permit Number:	P0105853
General Permit Category andType:	Not Applicable



Final Permit-to-Install
Guardian Manufacturing Company
Permit Number: P0119917
Facility ID: 0339030016
Effective Date:5/11/2016

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

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

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

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

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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

10. Applicability

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

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

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

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

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

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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



Final Permit-to-Install
Guardian Manufacturing Company
Permit Number: P0119917
Facility ID: 0339030016
Effective Date: 5/11/2016

B. Facility-Wide Terms and Conditions



Final Permit-to-Install
Guardian Manufacturing Company
Permit Number: P0119917
Facility ID: 0339030016
Effective Date: 5/11/2016

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



Final Permit-to-Install
Guardian Manufacturing Company
Permit Number: P0119917
Facility ID: 0339030016
Effective Date: 5/11/2016

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Rubber Glove Dip Ring Operations: P801, P802 and P804

EU ID	Operations, Property and/or Equipment Description
P801	large dip ring number 1 (formerly P001) and transfer and drying operations (drying formerly P006) for butyl rubber gloves
P802	small dip ring number 3 (formerly P002) and transfer and drying operations (drying formerly P006) for butyl rubber gloves
P804	large dip ring number 2 (formerly P004) and transfer and drying operations (drying formerly P006) for butyl rubber gloves

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

(1) b)(1)d., d)(9) through d)(12) and e)(2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	See b)(2)a.
b.	OAC rule 3745-31-05(D)	60.4 pounds volatile organic compounds (VOC) per hour (for emissions units P801, P802, and P804, combined) 192.1 tons VOC per rolling, 12-month period, for emissions units P801, P802, and P804, combined. See b)(2)b., b)(2)c. and c)(1)
c.	OAC rule 3745-21-07(M)(1)	85 percent overall VOC control efficiency See b)(2)d.
d.	OAC rule 3745-114 ORC 3704.03(F)	See d)(9) through d)(12) and e)(2).

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) requirement for these emissions units has been determined to be the use of a carbon adsorption control system which complies with the requirements in c)(1).

- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding Prevention of Significant Deterioration (PSD) major source thresholds. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1):
- i. 192.1 tons VOC per rolling, 12-month period [for emissions units P801, P802 and P804, combined] based on material usage restrictions [See c)(2)]; and
 - ii. 60.4 pounds VOC per hour [for emissions units P801, P802, and P804, combined].
- c. In order to meet the requirements in c)(1) [and the requirements of OAC rule 3745-21-07(M)(1) – See b)(2)d.] for VOC emissions from glove dipping, transferring, and drying operations, the carbon adsorption control system shall be operated in accordance with the following requirements:
- i. Glove dipping operations (dip ring operations) shall be controlled with a carbon adsorption system. The carbon adsorption system shall achieve a 100 percent capture efficiency and a 93.0 percent minimum removal efficiency for VOC emissions from the dipping operations. It should be noted that VOC emissions from transferring and drying operations are not controlled, the carbon adsorption system only provides control for the dipping operations.
 - ii. The carbon adsorption system shall consist of three individual carbon beds. Two of the three carbon beds shall be on-line (i.e. the organic laden vent stream from the dip rings is passing through the bed) when dip ring operations are being performed.
 - iii. The regeneration cycle for a carbon bed (i.e. passing of steam through the carbon bed) shall last for at least 50 minutes followed by a cooling period of at least 30 minutes.
 - iv. An individual carbon bed shall only be on-line (i.e. the organic laden vent stream from the dip rings is passing through the bed) for the time periods indicated below:
 - (a) not to exceed 200 minutes when operating under “normal” load conditions. Normal load conditions are defined as any period of time when all dip ring units (P801, P802, and P804) operate simultaneously or when the large dip ring units (emission units P801 and P804) operate simultaneously.
 - (b) not to exceed 300 minutes when operating under “low” load conditions. Low load conditions are defined as any period of time when only one dip ring unit is operating or when the small dip ring unit (P802) operates simultaneously with one large dip ring unit (P801 or P804).

- v. The boiler providing steam for carbon bed regeneration shall supply steam at a minimum of 80 psig pressure.
- vi. The carbon adsorption control system shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.
- d. Emissions units P801, P802, and P804 shall, in accordance with OAC 3745-21-07(M)(1), be equipped with a carbon adsorption control system (i.e., capture and control equipment) that reduces the VOC emissions by an overall control efficiency of at least eighty-five percent, by weight. See b)(2)a.i. above for specific details regarding the capture and control requirements for the carbon adsorption control system for purposes of meeting the overall control efficiency for VOC emissions.

*It should be noted that OAC rule 3745-21-07(M)(1) identifies P001, P002, and P004 as the emissions unit IDs at this facility requiring control. The emissions unit IDs for P001, P002, and P004 have been changed to P801, P802, and P804, respectively. Additionally emissions associated with the drying operations (dry oven) were previously identified as emissions unit P006 and have been incorporated into emission units P801, P802, and P804.

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing federally enforceable requirements [See b)(2)a.] :
 - a. the installation of a carbon adsorber with a minimum VOC removal efficiency of at least 93%; and
 - b. 100% VOC capture efficiency for the dip ring rooms.
- (2) The maximum rolling, 12-month material containing VOC (measured in 'dip trays' of gloves, of varying thickness) employed in emissions units P801, P802, and P804 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{n=1}^n [(T_i)(EF_i)] \div \left(\frac{2000 \text{ lb}}{\text{ton}} \right) \leq 192.1 \text{ tonsVOCperrolling, 12 monthperiod}$$

where,

M = the increment of the rolling 12-month period;

T_i = number of trays throughput per month (of each glove thickness) for each month within the rolling 12-month period;

EF_i = VOC emission factor, in pounds per tray (based on glove thickness); and

n = total number of unique glove thicknesses.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of VOC emissions upon issuance of this permit. The maximum annual VOC emissions for this emissions unit shall not exceed 192.1 tons, based upon a rolling, 12-month summation of the VOC emissions.

- (3) The requirement to achieve a 100% capture efficiency for dipping operations (dip ring operations) permanent total enclosures shall be constructed to totally enclose the dip ring operations, such that all organic compound emissions are captured, contained, and directed to the control device.

The permanent total enclosures shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H₂O), whenever the emission unit(s) within the enclosure is/are in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
- a. the number trays, for each glove type dipped;
 - b. the VOC emissions rate [d)(1)a. x EF*] for each glove type dipped], in pounds per month; and
 - c. the total VOC emissions rate [summation of d)(1)b. for each glove type dipped] for the month, in tons.

* The following emission factors have been developed for glove types dipped based on glove thickness and length:

- Class '0' electricians' gloves: 7.7 lb VOC per tray;
- 35 mil thickness/14 inch length: 5.5 lb VOC per tray;
- 25 mil thickness/14 inch length: 4.0 lb VOC per tray;
- 14 mil thickness/14 inch length: 2.8 lb VOC per tray;
- 7 mil thickness/14 inch length: 1.7 lb VOC per tray.

The above emissions factors (excluding the class "0" electrician's gloves) were established from the results of emissions testing involving gloves with a 25 mil thickness and 14 inch length. The use of emission factors other than those presented above or use of emission factors for glove types not presented must be approved by Ohio EPA prior to use [See g)(1)].

- (2) The permittee shall collect and record the following information each month for emissions units P801, P802, and P804, combined:

- a. the total VOC emission rate [summation of d)(1)c, for all emissions units as listed above], in tons; and
 - b. the rolling 12-month VOC emissions total VOC, in tons.
- (3) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):
- a. the measured diameter of each natural draft opening;
 - b. the distance measured from each natural draft opening to each VOC emitting point;
 - c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;
 - d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and
 - e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.
- (4) The permittee shall install, operate, and maintain monitoring devices that continuously monitor the differential pressure between the inside and outside of the permanent total enclosure when emission unit(s) within the enclosure is/are in operation. The monitoring and devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.
- The permittee shall collect and record the difference in pressure between the permanent total enclosure and the surrounding areas once each operating shift:
- (5) The permittee shall properly install, operate, and maintain equipment to continuously monitor the temperature of each carbon bed in the carbon adsorption control system.
- The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
- (6) The permittee shall record the carbon bed temperature during each regeneration cycle of a carbon bed in the carbon adsorption control system. The acceptable requirement for carbon bed temperature is achieving a minimum temperature equal to or greater than 210 degrees Fahrenheit during the regeneration cycle.
- (7) The permittee shall maintain records of the following information concerning operation of the carbon adsorption control system and associated dip ring operations:
- a. identification of time periods the dip rings operated under normal and low load conditions;

- b. identification of the carbon adsorption control system settings for each time period identified in d)(7)a. above:
 - i. regeneration cycle time, in minutes
 - ii. cooling cycle time, in minutes
 - iii. standby time, in minutes
 - iv. associated on-line time, in minutes
 - v. verification that the time settings associated with items i. through i.v. above result in two individual carbon beds being on-line at all times.
 - vi. boiler steam supply operational set point, in psig
- (8) Whenever the information recorded in d)(7)b. above deviates from requirements established with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value(s) or operating condition(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. readings immediately after the corrective action was implemented of the following:
 - i. carbon bed regeneration temperature

- ii. carbon bed operating conditions specified in this permit
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The minimum values for the temperature and steam pressure during regeneration and the operating requirements of a carbon bed are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the acceptable values based upon information obtained during future testing that demonstrate compliance with the allowable emissions for the controlled operations of emissions unit(s). In addition, approved revisions to the minimum values may be incorporated into this permit by means of a minor permit modification.

- (9) The PTI application for these emissions units, P801, P802, and P804, was evaluated based on the total emissions, actual materials and the design parameters of the emissions units' exhaust systems, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “24” hours per day and “7” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: Xylene (78% of emissions)

TLV (mg/m³): 433

Maximum Hourly Emission Rate (lbs/hr): 47.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 5376

MAGLC (ug/m³): 10,321

Toxic Contaminant: Toluene (20% of emissions)

TLV (mg/m³): 75

Maximum Hourly Emission Rate (lbs/hr): 12.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1378

MAGLC (ug/m³): 1791

The permittee, has demonstrated that emissions of xylene and toluene from emissions units P801, P802, and P804 combined are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (10) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit(s), described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(11) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(12) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

- a. all exceedances of the rolling, 12-month combined VOC emission limitation of 192.1 tons (for emissions units P801, P802, and P804, combined);

- b. all times during which the permanent total enclosure(s) was/were not maintained at the minimum pressure differential of 0.007 inches of water;
- c. each regeneration period (time and date) when the temperature of the carbon bed during regeneration was below the minimum value specified in this permit;
- d. any period of time (start time and date, and end time and date) when the carbon adsorption control system was not operated in accordance with the requirements specified in b)(2)b.ii, b)(2)b.iii, b)(2)b.iv, and b)(2)b.v;
- e. each incident of deviation described in e)(1)b., e)(1)c. or e)(1)d. (above) where a prompt investigation was not conducted;
- f. each incident of deviation described in e)(1)b., e)(1)c. or e)(1)d. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the regeneration temperature, and operating requirements of a carbon bed and/or boiler into compliance with the acceptable values and requirements, was determined to be necessary and was not taken; and
- g. each incident of deviation described in e)(1)b., e)(1)c. or e)(1)d. where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:
 - a. the original model input;
 - b. the updated model input;
 - c. the reason for the change(s) to the input parameter(s); and
 - d. a summary of the results of the updated modeling, including the input changes; and
 - e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions units, or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emissions testing for emissions units P801, P802 and P804 in accordance with the following requirements:
 - a. Emissions testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the 93% minimum VOC removal efficiency for the carbon adsorption system, the 100% VOC capture efficiency for the dip ring rooms and the 60.4 lb VOC/hr emission limitation.
 - c. The following test method shall be employed to demonstrate compliance with the hourly emission limitation: for VOC, Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A. The test methods which must be employed to demonstrate compliance with the capture and removal (control) efficiencies for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - f. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA



District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

- g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
 - h. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:

60.4 pounds VOC per hour (for emissions units P801, P802 and P804, combined)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with the requirements in f)(1) and in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4, and 18, 25, and/or 25A, as applicable.
 - b. Emission Limitation:

192.1 tons VOC per rolling 12-month period (for emissions units P801, P802, and P804, combined)



Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in sections d)(1) and d)(2).

c. Emission Limitation:

93 percent minimum VOC removal efficiency (for the carbon adsorption system)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the minimum VOC removal efficiency requirement above in accordance with the requirements of f)(1) and in 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 18, 25, or 25A, as appropriate.

d. Emission Limitation:

100 percent VOC capture efficiency (for the dip ring rooms)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the 100 percent VOC capture efficiency requirement above in accordance with the requirements of f)(1) and in 40 CFR, Part 51, Appendix M, Method 204.

e. Emission Limitation:

85 percent overall VOC control efficiency

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the requirement above in accordance with: 40 CFR, Part 51, Appendix M, Method 204; and 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 18, 25, or 25A, as appropriate.

The permittee demonstrated 94 percent VOC capture efficiency including transfer and drying operations, and 96 percent VOC control efficiency of the carbon adsorption system, (for overall VOC control efficiency of 90 percent) in accordance with the results of emissions testing conducted on October 29, 2004.



g) Miscellaneous Requirements

- (1) The permittee may request, in writing, the use of emission factors other than those presented in d)(1) and/or may request the establishment of emission factors for the dipping of new glove types. The written request shall include information used to develop the requested emission factor. Written approval from the Ohio EPA must be obtained prior to the use of an emission factor in calculating VOC emissions as required in d)(1). The permittee should be advised that the dipping of new gloves types may constitute a modification as defined by OAC rule 3745-31-01. If the processing of a new glove type meets the definition of a "modification", the permittee shall apply for and obtain a final permit-to-install prior to performing any changes to the glove dipping operations.