



State of Ohio Environmental Protection Agency

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

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: 16-02155**

**DATE: 12/6/2001**

Russell Products Co FCS Division  
Tom Allen  
275 N Forge St  
Akron, OH 44304

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



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**Permit To Install  
Terms and Conditions**

**Issue Date: 12/6/2001  
Effective Date: 12/6/2001**

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**FINAL PERMIT TO INSTALL 16-02155**

Application Number: 16-02155  
APS Premise Number: 1677011129  
Permit Fee: **\$600**  
Name of Facility: Russell Products Co FCS Division  
Person to Contact: Tom Allen  
Address: 275 N Forge St  
Akron, OH 44304

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**275 N Forge St  
Akron, Ohio**

Description of proposed emissions unit(s):  
**Modification to PTI Limits 16-02137 and 16-02144, Covering Emissions Units R002, R003, and R004.**

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>
OCs	51.4
individual HAPs	8.0
combined HAPs	21.2

**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>
<p>R002 - Booth 2 (formerly permitted in PTI 16-02137 issued 6/12/01) coating urethane foam, spray booth with exhaust fan filter elements to catch paint overspray, emissions of organic compounds (OCs) and hazardous air pollutants (HAPs) uncontrolled, cleanup performed separately from this emissions unit, and MODIFICATION per PTI 16-02155 to increase emission allowables due to coating formulation changes and impose facility-requested federally enforceable Title V Synthetic Minor (TVSM) limitations on maximum hours of operation</p>	<p>OAC rule 3745-31-05 (A)(3)</p> <p>OAC rule 3745-31-05 (D)</p> <p>OAC rule 3745-21-07 (G)(2)</p>	<p><u>For the emissions unit:</u> 8.7 pounds/hour &amp; 11.3 tons/year of OCs; <u>except</u> on any day photochemically reactive materials (PRMs), as defined by OAC rule 3745-21-01 (C)(5), are used, the following OC emission limits shall dominate: 8.0 pounds/hour &amp; 40.0 pounds/day.</p> <p><u>For the facility:</u> 51.4 tons/year of OCs; 8.0 tons/year of individual HAPs; &amp; 21.2 tons/year of combined HAPs.</p> <p>The tons/year emissions limits are based upon the federally enforceable rolling, 12-month summation of operating hours restriction of Part II, section B.4.</p> <p>The OC emission limitations required by OAC rule 3745-21-07 (G)(2) are equal to or less stringent than the OC emission limitations established pursuant to OAC rule 3745-31-05 (A)(3).</p>

**2. Additional Terms and Conditions**

**2.a** The 8.7 pounds/hour and the 11.3 tons/year OC emission limits [regulated per OAC rule 3745-31-05 (A)(3)] are based, respectively, upon the unrestricted hourly potential to emit and the operating hours restricted yearly potential to emit for this emissions unit, as determined from application data. Similarly, the 51.4 tons/year OC, 8.0 tons/year individual HAP (IHAP), and 21.2 tons/year combined HAP (CHAP) emission limits [regulated per OAC rule 3745-31-05 (D)] are based upon the federally enforceable TVSM yearly potential to emit for this facility, as determined from application data. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits.

However, if any proposed change(s), such as with coating formulations, maximum coating application rate capacity, cleanup materials, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to making the change(s).

**B. Operational Restrictions**

1. The permittee shall employ properly installed and maintained spray booth exhaust fan filter elements to catch paint overspray at all times the emissions unit is in operation.
2. The permittee shall not perform any cleanup in this emissions unit. Any necessary cleanup shall take place in a designated operation separate from this emissions unit.
3. The permittee shall be restricted to coating only the types of parts and products specified in the application. No other types of parts or products shall be coated in this emissions unit.
4. The maximum annual operating hours for this emissions unit shall not exceed 2600, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	217
1-2	433
1-3	650

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**Emissions Unit ID: R002**

1-4	867
1-5	1083
1-6	1300
1-7	1517
1-8	1733
1-9	1950
1-10	2167
1-11	2383
1-12	2600

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

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

1. The permittee shall document the following incidents each day for the line:
  - a. Spray booth exhaust fan filter elements not employed as required above in section B.1.
  - b. Cleanup performed in this emissions unit.
  - c. Coating other types of parts or products not specified in the application.
2. The permittee shall collect and record the following information each day PRMs are used in the coating line:
  - a. The company identification of each coating, as applied after final formulation.
  - b. The number of gallons of each coating, as applied after final formulation.
  - c. The OC content of each coating, as applied after final formulation, in pounds of OCs/gallon of coating.
  - d. The total OC emissions from all coatings, as applied after final formulation, in pounds of OCs/day, i.e.,  $d = \text{sum } [b \times c]$  for all coatings.
  - e. The total hours of operation.
  - f. The average hourly OC emissions, in pounds of OCs/hour, i.e.,  $f = d/e$ .
  - g. The cumulative daily OC emissions for the calendar year, in tons of OCs/year, for all days PRMs are used, i.e.,  $g = \text{sum } [d]$  for all days PRMs are used.

Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings, as applied after final formulation.

3. The permittee shall maintain monthly records of the following information:

- a. The operating hours for each month.
- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours.

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

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

Pollutant: toluene (CAS 108-88-3)

TLV (ug/m3): 188,000

Maximum Average Hourly Emission Rate (lbs/hr): 8.7

Predicted 1-Hour Maximum Ground-Level Concentration at 82 m (ug/m3): 1233

MAGLC (ug/m3): 4476

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 Toxics 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 Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

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

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**Emissions Unit ID: R002**

If the permittee determines that the "Air Toxics 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.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics 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 Toxics 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 Toxics Policy" for the change.

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

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record detailing any of the incidents documented above in section C.1. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month of the incident(s).
2. The permittee shall submit deviation (excursion) reports identifying each day PRMs are used during which the average hourly and/or daily OC emissions from the emissions unit exceeded, respectively, 8.0 pounds/hour & 40.0 pounds/day, and the actual average hourly and daily OC emissions for each such day.

The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit if PRMs are used for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels.

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**Russel**

**PTI A**

**Issued: 12/6/2001**

Emissions Unit ID: **R002**

4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 2 of this permit.

### E. Testing Requirements

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

- a. Emission Limitation: 8.7 pounds/hour of OCs (emissions unit)

Applicable Compliance Method: Compliance shall be demonstrated based upon the unrestricted hourly potential to emit, as demonstrated below:

$$E[\text{OCs}]_h = C(\text{OC});$$

Where:

$E[\text{OCs}]_h = 8.7$  pounds of OCs/hour [unrestricted hourly potential to emit];

$C = 1.5$  gallons of coating/hour [maximum coating application rate capacity, as applied after final formulation]; and

$\text{OC} = 5.764$  pounds of OCs/gallon of coating [maximum OC content of coatings, as applied after final formulation].

- b. Emission Limitations: 8.0 pounds/hour & 40.0 pounds/day of OCs (emissions unit)

Applicable Compliance Method: Compliance shall be demonstrated based upon the record keeping requirements of section C.2 of this permit.

- c. Emission Limitation: 11.3 tons/year of OCs (emissions unit)

Applicable Compliance Method: Compliance shall be demonstrated based upon the operating hours restricted yearly potential to emit, as demonstrated below:

$$E[\text{OCs}]_y = (E[\text{OCs}]_h)HW;$$

Where:

$E[\text{OCs}]_y = 11.3$  tons of OCs/year [operating hours restricted yearly potential to emit];

$E[\text{OCs}]_h = 8.7$  pounds of OCs/hour [unrestricted hourly potential to emit];

$H = 2600$  hours/year [restricted operating hours schedule]; and

$W = 1$  ton/2000 pounds [weight conversion].

- d. Emission Limitation: 51.4 tons/year of OCs (facility)

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**Emissions Unit ID: R002**

Applicable Compliance Method: Compliance shall be demonstrated based upon the federally enforceable Title V synthetic minor potential to emit, as demonstrated below:

$$F[\text{OCs}]_y = R001 + R002 + R003 + R004 + \text{DGW};$$

Where:

$F[\text{OCs}]_y = 51.4$  tons/year of OCs [facility restricted yearly potential to emit];

$R001 = 7.3$  tons/year of OCs [OAC rule 3745-21-07 (G)(2) administrative potential to emit for R001];

$R002 = 11.3$  tons/year of OCs [operating hours restricted yearly potential to emit for R002];

$R003 = 11.3$  tons/year of OCs [operating hours restricted yearly potential to emit for R003];

$R004 = 21.5$  tons/year of OCs [operating hours restricted yearly potential to emit for R004];

$D = 6.77$  pounds/gallon [density of cleanup material];

$G = 12$  gallons/year [maximum annual cleanup material usage]; and

$W = 1$  ton/2000 pounds [weight conversion].

- e. Emission Limitation: 8.0 tons/year of IHAPs (facility)

Applicable Compliance Method: Compliance shall be demonstrated based upon the federally enforceable Title V synthetic minor potential to emit, as demonstrated below:

$$F[\text{IHAPs}]_y = f(\text{OC1}) + (C2)(\text{IHAP2})\text{HW} + (C3)(\text{IHAP3})\text{HW} + \text{DGW};$$

Where:

$F[\text{IHAPs}]_y = 8.0$  tons/year of IHAPs [facility restricted yearly potential to emit];

$\text{OC1} = 7.3$  tons/year of OCs [OAC rule 3745-21-07 (G)(2) administrative potential to emit for R001];

$f = 0.1254$  [weight fraction for highest facility IHAP emissions];

$C2 = C3 = 1.5$  gallons of coating/hour, respectively, for R002 & R003 [maximum coating application rate capacity, as applied after final formulation];

$\text{IHAP2} = \text{IHAP3} = 1.810$  pounds of individual HAP/gallon of coating, respectively, for R002 & R003 [maximum individual HAP content of coating, as applied after final formulation];

$D = 6.77$  pounds/gallon [density of cleanup material];

$G = 12$  gallons/year [maximum annual cleanup material usage];

$H = 2600$  hours/year [restricted operating hours schedule]; and

$W = 1$  ton/2000 pounds [weight conversion].

[Note: R004 uses coating formulations and emits organic compounds uniquely different from R001 through R003. When using a trichloroethylene-based formulation (a PRM), R004 has the (administrative) potential to emit 7.3 tons/year each of IHAPs and CHAPs.]

- f. Emission Limitation: 21.2 tons/year of CHAPs (facility)

Applicable Compliance Method: Compliance shall be demonstrated based upon the federally enforceable Title V synthetic minor potential to emit, as demonstrated below:

$$F[\text{CHAPs}]_y = f_1(\text{OC1}) + (C2)(\text{CHAP2})\text{HW} + (C3)(\text{CHAP3})\text{HW} + f_4(\text{OC4}) + \text{DGW};$$

Where:

$F[\text{CHAPs}]_y = 21.2$  tons/year of CHAPs [facility restricted yearly potential to emit];  
 $\text{OC1} = 7.3$  tons/year of OCs [OAC rule 3745-21-07 (G)(2) administrative potential to emit for R001];  
 $f_1 = 0.3908$  [weight fraction as CHAP emissions];  
 $C2 = C3 = 1.5$  gallons of coating/hour, respectively, for R002 & R003 [maximum coating application rate capacity, as applied after final formulation];  
 $\text{CHAP2} = \text{CHAP3} = 2.815$  pounds of combined HAPs/gallon of coating, respectively, for R002 & R003 [maximum combined HAP content of coating, as applied after final formulation];  
 $\text{OC4} = 7.3$  tons/year of OCs [OAC rule 3745-21-07 (G)(2) administrative potential to emit for R004];  
 $f_4 = 1.0$  [weight fraction as CHAP emissions];  
 $D = 6.77$  pounds/gallon [density of cleanup material];  
 $G = 12$  gallons/year [maximum annual cleanup material usage];  
 $H = 2600$  hours/year [restricted operating hours schedule]; and  
 $W = 1$  ton/2000 pounds [weight conversion].

[Note: R004 uses coating formulations and emits organic compounds uniquely different from R001 through R003. When using a trichloroethylene-based formulation (a PRM), R004 has the (administrative) potential to emit 7.3 tons/year each of IHAPs and CHAPs.]

## F. Miscellaneous Requirements

1. Permit to install (PTI) 16-02155 supersedes all of the requirements of PTI 16-02137 issued 6/12/01.
2. The following line items of these terms and conditions are federally enforceable: B.4, C.2, C.3,

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**Facility ID: 1677011129**

**Emissions Unit ID: R002**

D.2, D.3, D.4, E.1.b, E.1.d, E.1.e, and E.1.f

**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>
<p>R003 - Booth 3 (formerly permitted in PTI 16-02137 issued 6/12/01) coating urethane foam, spray booth with exhaust fan filter elements to catch paint overspray, emissions of organic compounds (OCs) and hazardous air pollutants (HAPs) uncontrolled, cleanup performed separately from this emissions unit, and MODIFICATION per PTI 16-02155 to increase emission allowables due to coating formulation changes and impose facility-requested federally enforceable Title V Synthetic Minor (TVSM) limitations on maximum hours of operation</p>	<p>OAC rule 3745-31-05 (A)(3)</p> <p>OAC rule 3745-31-05 (D)</p> <p>OAC rule 3745-21-07 (G)(2)</p>	<p><u>For the emissions unit:</u> 8.7 pounds/hour &amp; 11.3 tons/year of OCs; <u>except</u> on any day photochemically reactive materials (PRMs), as defined by OAC rule 3745-21-01 (C)(5), are used, the following OC emission limits shall dominate: 8.0 pounds/hour &amp; 40.0 pounds/day.</p> <p><u>For the facility:</u> 51.4 tons/year of OCs; 8.0 tons/year of individual HAPs; &amp; 21.2 tons/year of combined HAPs.</p> <p>The tons/year emissions limits are based upon the federally enforceable rolling, 12-month summation of operating hours restriction of Part II, section B.4.</p> <p>The OC emission limitations required by OAC rule 3745-21-07 (G)(2) are equal to or less stringent than the OC emission limitations established pursuant to OAC rule 3745-31-05</p>

(A)(3).

## 2. Additional Terms and Conditions

- 2.a The 8.7 pounds/hour and the 11.3 tons/year OC emission limits [regulated per OAC rule 3745-31-05 (A)(3)] are based, respectively, upon the unrestricted hourly potential to emit and the operating hours restricted yearly potential to emit for this emissions unit, as determined from application data. Similarly, the 51.4 tons/year OC, 8.0 tons/year individual HAP (IHAP), and 21.2 tons/year combined HAP (CHAP) emission limits [regulated per OAC rule 3745-31-05 (D)] are based upon the federally enforceable TVSM yearly potential to emit for this facility, as determined from application data. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits.

However, if any proposed change(s), such as with coating formulations, maximum coating application rate capacity, cleanup materials, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to making the change(s).

## B. Operational Restrictions

1. The permittee shall employ properly installed and maintained spray booth exhaust fan filter elements to catch paint overspray at all times the emissions unit is in operation.
2. The permittee shall not perform any cleanup in this emissions unit. Any necessary cleanup shall take place in a designated operation separate from this emissions unit.
3. The permittee shall be restricted to coating only the types of parts and products specified in the application. No other types of parts or products shall be coated in this emissions unit.
4. The maximum annual operating hours for this emissions unit shall not exceed 2600, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
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**Issued**

**Facility ID: 1677011129**

**Emissions Unit ID: R003**

1	217
1-2	433
1-3	650
1-4	867
1-5	1083
1-6	1300
1-7	1517
1-8	1733
1-9	1950
1-10	2167
1-11	2383
1-12	2600

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the following incidents each day for the line:
  - a. Spray booth exhaust fan filter elements not employed as required above in section B.1.
  - b. Cleanup performed in this emissions unit.
  - c. Coating other types of parts or products not specified in the application.
2. The permittee shall collect and record the following information each day PRMs are used in the coating line:
  - a. The company identification of each coating, as applied after final formulation blending.
  - b. The number of gallons of each coating, as applied after final formulation blending.
  - c. The OC content of each coating, as applied after final formulation blending, in pounds of OCs/gallon of coating.
  - d. The total OC emissions from all coatings, as applied after final formulation blending, in pounds of OCs/day, i.e.,  $d = \text{sum } [b \times c]$  for all coatings.
  - e. The total hours of operation.
  - f. The average hourly OC emissions, in pounds of OCs/hour, i.e.,  $f = d/e$ .
  - g. The cumulative daily OC emissions for the calendar year, in tons of OCs/year, for the days PRMs are used, i.e.,  $g = \text{sum } [d]$  for all days PRMs are used.

Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings, as applied after final formulation blending.

3. The permittee shall maintain monthly records of the following information:

- a. The operating hours for each month.
- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours.

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

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

Pollutant: toluene (CAS 108-88-3)

TLV (ug/m3): 188,000

Maximum Average Hourly Emission Rate (lbs/hr): 8.7

Predicted 1-Hour Maximum Ground-Level Concentration at 82 m (ug/m3): 1233

MAGLC (ug/m3): 4476

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 Toxics 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 Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

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

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If the permittee determines that the "Air Toxics 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.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics 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 Toxics 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 Toxics Policy" for the change.

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

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record detailing any of the incidents documented above in section C.1. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month of the incident(s).
2. The permittee shall submit deviation (excursion) reports identifying each day PRMs are used during which the average hourly and/or daily OC emissions from the emissions unit exceeded, respectively, 8.0 pounds/hour & 40.0 pounds/day, and the actual average hourly and daily OC emissions for each such day.

The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit if PRMs are used for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels.

4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 2 of this permit.

## E. Testing Requirements

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

- a. Emission Limitation: 8.7 pounds/hour of OCs (emissions unit)

Applicable Compliance Method: Compliance shall be demonstrated based upon the unrestricted hourly potential to emit, as demonstrated below:

$$E[\text{OCs}]_h = C(\text{OC});$$

Where:

$E[\text{OCs}]_h = 8.7$  pounds of OCs/hour [unrestricted hourly potential to emit];

$C = 1.5$  gallons of coating/hour [maximum coating application rate capacity, as applied after final formulation]; and

$\text{OC} = 5.764$  pounds of OCs/gallon of coating [maximum OC content of coatings, as applied after final formulation].

- b. Emission Limitations: 8.0 pounds/hour & 40.0 pounds/day of OCs (emissions unit)

Applicable Compliance Method: Compliance shall be demonstrated based upon the record keeping requirements of section C.2 of this permit.

- c. Emission Limitation: 11.3 tons/year of OCs (emissions unit)

Applicable Compliance Method: Compliance shall be demonstrated based upon the operating hours restricted yearly potential to emit, as demonstrated below:

$$E[\text{OCs}]_y = (E[\text{OCs}]_h)HW;$$

Where:

$E[\text{OCs}]_y = 11.3$  tons of OCs/year [operating hours restricted yearly potential to emit];

$E[\text{OCs}]_h = 8.7$  pounds of OCs/hour [unrestricted hourly potential to emit];

$H = 2600$  hours/year [restricted operating hours schedule]; and

$W = 1$  ton/2000 pounds [weight conversion].

- d. Emission Limitation: 51.4 tons/year of OCs (facility)

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Applicable Compliance Method: Compliance shall be demonstrated based upon the federally enforceable Title V synthetic minor potential to emit, as demonstrated below:

$$F[\text{OCs}]_y = R001 + R002 + R003 + R004 + \text{DGW};$$

Where:

$F[\text{OCs}]_y = 51.4$  tons/year of OCs [facility restricted yearly potential to emit];

$R001 = 7.3$  tons/year of OCs [OAC rule 3745-21-07 (G)(2) administrative potential to emit for R001];

$R002 = 11.3$  tons/year of OCs [operating hours restricted yearly potential to emit for R002];

$R003 = 11.3$  tons/year of OCs [operating hours restricted yearly potential to emit for R003];

$R004 = 21.5$  tons/year of OCs [operating hours restricted yearly potential to emit for R004];

$D = 6.77$  pounds/gallon [density of cleanup material];

$G = 12$  gallons/year [maximum annual cleanup material usage]; and

$W = 1$  ton/2000 pounds [weight conversion].

- e. Emission Limitation: 8.0 tons/year of IHAPs (facility)

Applicable Compliance Method: Compliance shall be demonstrated based upon the federally enforceable Title V synthetic minor potential to emit, as demonstrated below:

$$F[\text{IHAPs}]_y = f(\text{OC1}) + (C2)(\text{IHAP2})\text{HW} + (C3)(\text{IHAP3})\text{HW} + \text{DGW};$$

Where:

$F[\text{IHAPs}]_y = 8.0$  tons/year of IHAPs [facility restricted yearly potential to emit];

$\text{OC1} = 7.3$  tons/year of OCs [OAC rule 3745-21-07 (G)(2) administrative potential to emit for R001];

$f = 0.1254$  [weight fraction for highest facility IHAP emissions];

$C2 = C3 = 1.5$  gallons of coating/hour, respectively, for R002 & R003 [maximum coating application rate capacity, as applied after final formulation];

$\text{IHAP2} = \text{IHAP3} = 1.810$  pounds of individual HAP/gallon of coating, respectively, for R002 & R003 [maximum individual HAP content of coating, as applied after final formulation];

$D = 6.77$  pounds/gallon [density of cleanup material];

$G = 12$  gallons/year [maximum annual cleanup material usage];

$H = 2600$  hours/year [restricted operating hours schedule]; and

$W = 1$  ton/2000 pounds [weight conversion].

[Note: R004 uses coating formulations and emits organic compounds uniquely different from R001 through R003. When using a trichloroethylene-based formulation (a PRM), R004 has the (administrative) potential to emit 7.3 tons/year each of IHAPs and CHAPs.]

- f. Emission Limitation: 21.2 tons/year of CHAPs (facility)

Applicable Compliance Method: Compliance shall be demonstrated based upon the federally enforceable Title V synthetic minor potential to emit, as demonstrated below:

$$F[\text{CHAPs}]_y = f_1(\text{OC1}) + (C2)(\text{CHAP2})\text{HW} + (C3)(\text{CHAP3})\text{HW} + f_4(\text{OC4}) + \text{DGW};$$

Where:

$F[\text{CHAPs}]_y = 21.2$  tons/year of CHAPs [facility restricted yearly potential to emit];

$\text{OC1} = 7.3$  tons/year of OCs [OAC rule 3745-21-07 (G)(2) administrative potential to emit for R001];

$f_1 = 0.3908$  [weight fraction as CHAP emissions];

$C2 = C3 = 1.5$  gallons of coating/hour, respectively, for R002 & R003 [maximum coating application rate capacity, as applied after final formulation];

$\text{CHAP2} = \text{CHAP3} = 2.815$  pounds of combined HAPs/gallon of coating, respectively, for R002 & R003 [maximum combined HAP content of coating, as applied after final formulation];

$\text{OC4} = 7.3$  tons/year of OCs [OAC rule 3745-21-07 (G)(2) administrative potential to emit for R004];

$f_4 = 1.0$  [weight fraction as CHAP emissions];

$D = 6.77$  pounds/gallon [density of cleanup material];

$G = 12$  gallons/year [maximum annual cleanup material usage];

$H = 2600$  hours/year [restricted operating hours schedule]; and

$W = 1$  ton/2000 pounds [weight conversion].

[Note: R004 uses coating formulations and emits organic compounds uniquely different from R001 through R003. When using a trichloroethylene-based formulation (a PRM), R004 has the (administrative) potential to emit 7.3 tons/year each of IHAPs and CHAPs.]

## F. Miscellaneous Requirements

1. Permit to install (PTI) 16-02155 supersedes all of the requirements of PTI 16-02137 issued 6/12/01.

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**Facility ID: 1677011129**

Emissions Unit ID: **R003**

2. The following line items of these terms and conditions are federally enforceable: B.4, C.2, C.3, D.2, D.3, D.4, E.1.b, E.1.d, E.1.e, and E.1.f.

**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>
R004 - Booth 4 (formerly permitted in PTI 16-02144 issued 7/12/01) coating urethane foam, spray booth with exhaust fan filter elements to catch paint overspray, emissions of organic compounds (OCs) and hazardous air pollutants (HAPs) uncontrolled, cleanup performed separately from this emissions unit, and MODIFICATION per PTI 16-02155 to increase emission allowables due to coating formulation changes and impose facility-requested federally enforceable Title V Synthetic Minor (TVSM) limitations on maximum hours of operation	OAC rule 3745-31-05 (A)(3)  OAC rule 3745-31-05 (D)  OAC rule 3745-21-07 (G)(2)	<p><u>For the emissions unit:</u> 16.5 pounds/hour &amp; 21.5 tons/year of OCs; <u>except</u> on any day photochemically reactive materials (PRMs), as defined by OAC rule 3745-21-01 (C)(5), are used, the following OC emission limits shall dominate: 8.0 pounds/hour &amp; 40.0 pounds/day.</p> <p><u>For the facility:</u> 51.4 tons/year of OCs; 8.0 tons/year of individual HAPs; &amp; 21.2 tons/year of combined HAPs.</p> <p>The tons/year emissions limits are based upon the federally enforceable rolling, 12-month summation of operating hours restriction of Part II, section B.4.</p> <p>The OC emission limitations required by OAC rule 3745-21-07 (G)(2) are equal to or less stringent than the OC emission limitations established pursuant to OAC rule 3745-31-05</p>

(A)(3).

## 2. Additional Terms and Conditions

- 2.a The 16.5 pounds/hour and the 21.5 tons/year OC emission limits [regulated per OAC rule 3745-31-05 (A)(3)] are based, respectively, upon the unrestricted hourly potential to emit and the operating hours restricted yearly potential to emit for this emissions unit, as determined from application data. Similarly, the 51.4 tons/year OC, 8.0 tons/year individual HAP (IHAP), and 21.2 tons/year combined HAP (CHAP) emission limits [regulated per OAC rule 3745-31-05 (D)] are based upon the federally enforceable TVSM yearly potential to emit for this facility, as determined from application data. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits.

However, if any proposed change(s), such as with coating formulations, maximum coating application rate capacity, cleanup materials, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to making the change(s).

## B. Operational Restrictions

1. The permittee shall employ properly installed and maintained spray booth exhaust fan filter elements to catch paint overspray at all times the emissions unit is in operation.
2. The permittee shall not perform any cleanup in this emissions unit. Any necessary cleanup shall take place in a designated operation separate from this emissions unit.
3. The permittee shall be restricted to coating only the types of parts and products specified in the application. No other types of parts or products shall be coated in this emissions unit.
4. The maximum annual operating hours for this emissions unit shall not exceed 2600, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
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**PTI Application: 16-02155**

**Issued**

**Facility ID: 1677011129**

**Emissions Unit ID: R004**

1	217
1-2	433
1-3	650
1-4	867
1-5	1083
1-6	1300
1-7	1517
1-8	1733
1-9	1950
1-10	2167
1-11	2383
1-12	2600

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the following incidents each day for the line:
  - a. Spray booth exhaust fan filter elements not employed as required above in section B.1.
  - b. Cleanup performed in this emissions unit.
  - c. Coating other types of parts or products not specified in the application.
2. The permittee shall collect and record the following information each day PRMs are used in the coating line:
  - a. The company identification of each coating, as applied after final formulation blending.
  - b. The number of gallons of each coating, as applied after final formulation blending.
  - c. The OC content of each coating, as applied after final formulation blending, in pounds of OCs/gallon of coating.
  - d. The total OC emissions from all coatings, as applied after final formulation blending, in pounds of OCs/day, i.e.,  $d = \text{sum } [b \times c]$  for all coatings.
  - e. The total hours of operation.
  - f. The average hourly OC emissions, in pounds of OCs/hour, i.e.,  $f = d/e$ .
  - g. The cumulative daily OC emissions for the calendar year, in tons of OCs/year, for the days PRMs are used, i.e.,  $g = \text{sum } [d]$  for all days PRMs are used.

Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings, as applied after final formulation blending.

3. The permittee shall maintain monthly records of the following information:

- a. The operating hours for each month.
- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours.

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

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

Pollutant: trichloroethylene (CAS 79-01-6)

TLV (ug/m3): 269,000

Maximum Average Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration at 23 m (ug/m3): 3617

MAGLC (ug/m3): 21,520

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 Toxics 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 Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

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

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**Facility ID: 1677011129**

**Emissions Unit ID: R004**

If the permittee determines that the "Air Toxics 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.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics 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 Toxics 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 Toxics Policy" for the change.

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

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record detailing any of the incidents documented above in section C.1. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month of the incident(s).
2. The permittee shall submit deviation (excursion) reports identifying each day PRMs are used during which the average hourly and/or daily OC emissions from the emissions unit exceeded, respectively, 8.0 pounds/hour & 40.0 pounds/day, and the actual average hourly and daily OC emissions for each such day.

The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit if PRMs are used for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels.

4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 2 of this permit.

## E. Testing Requirements

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

- a. Emission Limitation: 16.5 pounds/hour of OCs (emissions unit)

Applicable Compliance Method: Compliance shall be demonstrated based upon the unrestricted hourly potential to emit, as demonstrated below:

$$E[\text{OCs}]_h = C(\text{OC});$$

Where:

$E[\text{OCs}]_h = 16.5$  pounds of OCs/hour [unrestricted hourly potential to emit];

$C = 1.5$  gallons of coating/hour [maximum coating application rate capacity, as applied after final formulation]; and

$\text{OC} = 11.01$  pounds of OCs/gallon of coating [maximum OC content of coatings, as applied after final formulation].

- b. Emission Limitations: 8.0 pounds/hour & 40.0 pounds/day of OCs (emissions unit)

Applicable Compliance Method: Compliance shall be demonstrated based upon the record keeping requirements of section C.2 of this permit.

- c. Emission Limitation: 21.5 tons/year of OCs (emissions unit)

Applicable Compliance Method: Compliance shall be demonstrated based upon the operating hours restricted yearly potential to emit, as demonstrated below:

$$E[\text{OCs}]_y = (E[\text{OCs}]_h)HW;$$

Where:

$E[\text{OCs}]_y = 21.5$  tons of OCs/year [operating hours restricted yearly potential to emit];

$E[\text{OCs}]_h = 16.5$  pounds of OCs/hour [unrestricted hourly potential to emit];

$H = 2600$  hours/year [restricted operating hours schedule]; and

$W = 1$  ton/2000 pounds [weight conversion].

- d. Emission Limitation: 51.4 tons/year of OCs (facility)

**Russell Products Co FCS Division**

**PTI Application: 16-02155**

**Issued**

**Facility ID: 1677011129**

**Emissions Unit ID: R004**

Applicable Compliance Method: Compliance shall be demonstrated based upon the federally enforceable Title V synthetic minor potential to emit, as demonstrated below:

$$F[\text{OCs}]_y = R001 + R002 + R003 + R004 + \text{DGW};$$

Where:

$F[\text{OCs}]_y = 51.4$  tons/year of OCs [facility restricted yearly potential to emit];

$R001 = 7.3$  tons/year of OCs [OAC rule 3745-21-07 (G)(2) administrative potential to emit for R001];

$R002 = 11.3$  tons/year of OCs [operating hours restricted yearly potential to emit for R002];

$R003 = 11.3$  tons/year of OCs [operating hours restricted yearly potential to emit for R003];

$R004 = 21.5$  tons/year of OCs [operating hours restricted yearly potential to emit for R004];

$D = 6.77$  pounds/gallon [density of cleanup material];

$G = 12$  gallons/year [maximum annual cleanup material usage]; and

$W = 1$  ton/2000 pounds [weight conversion].

- e. Emission Limitation: 8.0 tons/year of IHAPs (facility)

Applicable Compliance Method: Compliance shall be demonstrated based upon the federally enforceable Title V synthetic minor potential to emit, as demonstrated below:

$$F[\text{IHAPs}]_y = f(\text{OC1}) + (C2)(\text{IHAP2})\text{HW} + (C3)(\text{IHAP3})\text{HW} + \text{DGW};$$

Where:

$F[\text{IHAPs}]_y = 8.0$  tons/year of IHAPs [facility restricted yearly potential to emit];

$\text{OC1} = 7.3$  tons/year of OCs [OAC rule 3745-21-07 (G)(2) administrative potential to emit for R001];

$f = 0.1254$  [weight fraction for highest facility IHAP emissions];

$C2 = C3 = 1.5$  gallons of coating/hour, respectively, for R002 & R003 [maximum coating application rate capacity, as applied after final formulation];

$\text{IHAP2} = \text{IHAP3} = 1.810$  pounds of individual HAP/gallon of coating, respectively, for R002 & R003 [maximum individual HAP content of coating, as applied after final formulation];

$D = 6.77$  pounds/gallon [density of cleanup material];

$G = 12$  gallons/year [maximum annual cleanup material usage];

$H = 2600$  hours/year [restricted operating hours schedule]; and

$W = 1$  ton/2000 pounds [weight conversion].

[Note: R004 uses coating formulations and emits organic compounds uniquely different from R001 through R003. When using a trichloroethylene-based formulation (a PRM), R004 has the (administrative) potential to emit 7.3 tons/year each of IHAPs and CHAPs.]

- f. Emission Limitation: 21.2 tons/year of CHAPs (facility)

Applicable Compliance Method: Compliance shall be demonstrated based upon the federally enforceable Title V synthetic minor potential to emit, as demonstrated below:

$$F[\text{CHAPs}]_y = f_1(\text{OC1}) + (C2)(\text{CHAP2})\text{HW} + (C3)(\text{CHAP3})\text{HW} + f_4(\text{OC4}) + \text{DGW};$$

Where:

$F[\text{CHAPs}]_y = 21.2$  tons/year of CHAPs [facility restricted yearly potential to emit];

$\text{OC1} = 7.3$  tons/year of OCs [OAC rule 3745-21-07 (G)(2) administrative potential to emit for R001];

$f_1 = 0.3908$  [weight fraction as CHAP emissions];

$C2 = C3 = 1.5$  gallons of coating/hour, respectively, for R002 & R003 [maximum coating application rate capacity, as applied after final formulation];

$\text{CHAP2} = \text{CHAP3} = 2.815$  pounds of combined HAPs/gallon of coating, respectively, for R002 & R003 [maximum combined HAP content of coating, as applied after final formulation];

$\text{OC4} = 7.3$  tons/year of OCs [OAC rule 3745-21-07 (G)(2) administrative potential to emit for R004];

$f_4 = 1.0$  [weight fraction as CHAP emissions];

$D = 6.77$  pounds/gallon [density of cleanup material];

$G = 12$  gallons/year [maximum annual cleanup material usage];

$H = 2600$  hours/year [restricted operating hours schedule]; and

$W = 1$  ton/2000 pounds [weight conversion].

[Note: R004 uses coating formulations and emits organic compounds uniquely different from R001 through R003. When using a trichloroethylene-based formulation (a PRM), R004 has the (administrative) potential to emit 7.3 tons/year each of IHAPs and CHAPs.]

## F. Miscellaneous Requirements

1. Permit to install (PTI) 16-02155 supersedes all of the requirements of PTI 16-02144 issued 7/12/01.
2. The following line items of these terms and conditions are federally enforceable: B.4, C.2, C.3,

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D.2, D.3, D.4, E.1.b, E.1.d, E.1.e, and E.1.f