Facility ID: 1431052206 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431052206 Emissions Unit ID: P007 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Emulsion polymerization process w/ thermal incinerator R-5	OAC 3745-31-05 (PTI 14-4191)	7.36 LBS OC/DAY,1.34 TPY OC 4.0 LBS PM/DAY, 0.73 TPY PM See A.2.
	OAC 3745-17-07(B)	Fugitive visible particulate emissions shall not exceed 20% opacity as a 3-minute average, except as specified by rule.
	OAC 3745-17-08(B)	Fugitive particulate emissions shall be minimized by the use of good engineering practices.
	OAC 3745-21-07(G)	Less stringent than the OC emissions limits established per OAC 3745-31-05.

2. **Additional Terms and Conditions**

   (a) Best Available Technology for the control of organic compound (OC) emissions from emissions units P003-P008 is the installation and maintenance of a thermal incinerator capable of maintaining a 95% overall control efficiency.
   The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any individual HAP and 25 TPY for any combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation.
   The PM emissions limits are based on the maximum production capacity of the equipment; therefore, no record keeping, reporting or testing is required to demonstrate compliance with the PM emissions limits.

B. **Operational Restrictions**

1. The average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall continuously monitor and record the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermal sensor, monitor, and recorder shall be guaranteed by the manufacturer to be within + 1 percent of the temperature being measured or + 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

   The permittee shall collect and record the following information each day:

   a. The average temperature of the exhaust gases from the thermal incinerator during each of the 8, 3-hour blocks of time during the day.

   b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

2. The permittee shall maintain monthly records of the following for the entire facility:

a. the name and identification number of each coating, as applied;
b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
c. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (b));
d. the number of gallons of each coating employed;
e. the name and identification of each cleanup material employed;
f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (f));
h. the number of gallons of each cleanup material employed;
i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (b) times (d) for each coating and the sum of (f) times (h) for each cleanup material);
j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
k. the controlled individual HAP emissions from this facility (multiply (i) for each HAP by (1-x/100)) where x is the overall control efficiency as demonstrated during the most recent emission test which showed that the emissions unit was in compliance;
l. the controlled combined HAP emissions from this facility (multiply (j) by (1-x/100)) where x is the overall control efficiency as demonstrated during the most recent emission test which showed that the emissions unit was in compliance;
m. the rolling, 12-month summation of the controlled individual HAP emissions from all coatings and cleanup materials employed, in tons per year (sum of (k) for each HAP for the previous 12 months); and
n. the rolling, 12-month summation of the controlled combined HAP emissions from all coatings and cleanup materials employed, in tons per year (sum of (l) for the previous 12 months).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

D. **Reporting Requirements**

1. The permittee shall submit semi-annual temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the thermal incinerator does not comply with the temperature limitation specified above.

   If no deviations occurred during the previous six calendar months, the permittee shall submit a report which states that no deviations occurred during that six months. The reports shall be submitted by January 30 and July 30 and cover the previous six calendar months (July through December and January through June, respectively).

2. The permittee shall submit semi-annual deviation (excursion) reports which show an exceedance of the individual and combined HAP emission limits based on a rolling, 12-month summation.

   If no deviations occurred during the previous 6 calendar months, the permittee shall submit a report which states that no deviations occurred during that 6 months. The reports shall be submitted by January 30 and July 30 and cover the previous 6 calendar months (July through December and January through June, respectively).

3. The permittee shall submit an annual report which summarizes the individual and total HAP emissions from this facility for the calendar year. This report shall be submitted by January 30 of each year.

E. **Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

   a. The emission testing shall be conducted within 6 months after issuance of this permit.

   b. The emission testing shall be conducted to demonstrate compliance with the 95% overall control efficiency for OC.

   c. The test method(s) which must be employed to demonstrate compliance with the overall control efficiency limitation for the allowable mass emission rate are specified below. 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.) 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 OAC rule 3745-21-10 or the approved alternative test protocol approved on 10/25/95"). 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."
   d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

   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).

   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.

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).

2. Compliance with OAC rule 3745-17-07(B) shall be demonstrated by methods outlined in OAC rule 3745-17-03(B)(3).

F. **Miscellaneous Requirements**

None