

Facility ID: 1431074053 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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: 1431074053 Emissions Unit ID: R002 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R002-Custom Laminate Operation	OAC rule 3745-31-05(A)(3) (PTI 14-04879)	Volatile Organic Compound (VOC) emissions shall not exceed 16.23 pounds per hour. The lbs/hr OC emission limit is based on the emissions unit's potential to emit. Therefore no hourly record keeping requirements, reporting, or compliance measures are required. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). See term A.2.a. See terms A.2.a, B.1 and B.2. The total combined VOC emissions from emissions units R001 and R002 shall not exceed 12.0 TPY, based on a rolling, 12-month summation.
	OAC rule 3745-31-05(C)	

2. Additional Terms and Conditions

- (a) The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units F001, P001, P002, P003, R001, R002, R003, R004, other de minimus air contaminant source, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. The VOC content of the adhesive materials employed in emissions units R002 shall not exceed 5.41 pounds of VOC per gallon of adhesive.
2. The total combined annual adhesive usage for emissions units R001 and R002 shall not exceed 4436 gallons based upon a rolling, 12-month summation of the adhesive usage figures.

Compliance with the annual adhesive usage limitation shall be based upon a rolling, 12-month summation of the adhesive usage figures.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The company identification of each liquid organic material (adhesive) employed in this emissions unit.
 - b. The VOC content of each liquid organic material, as applied, in pounds per gallon.

- c. The total combined adhesive usage for emissions units R001 and R002.
- d. The rolling 12-month summation of the adhesive usage totals for emissions units R001 and R002.
 - e. The rolling 12-month summation of the VOC emission totals for emissions units R001 and R002.
- 2. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.a:
 - a. The company identification for each liquid organic material (adhesive) employed.
 - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each liquid organic material in pounds of individual HAP per gallon of liquid organic material, as applied.
 - c. The total combined HAP content of each liquid organic material in pounds of combined HAPs per gallon of liquid organic material, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each liquid organic material employed.
 - e. The total individual HAP emissions for each HAP from all liquid organic materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each liquid organic material].
 - f. The updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - g. The total combined HAP emissions from all liquid organic materials employed, in pounds or tons per month [the sum of (c) times (d) for each liquid organic material].
 - h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar 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. Monthly HAP records may be kept on a facility-wide basis.
- 3. The permit to install for this emissions unit 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 Toxic 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3646

MAGLC (ug/m3): 4476

Physical changes to or 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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic

Policy"; and,

c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the VOC content requirements of 5.41 lbs VOC per gallon of adhesive was exceeded, and the actual VOC content for each such day.
 - b. An identification of each month during which the total combined adhesive usage limitation for emissions unit R001 and R002 of 4436 gallons per year, based on a rolling 12-month summation was exceeded, and the actual adhesive usage for the 12-month period.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of HAP emissions limitations set forth in term A.2.a.
3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.
4. The permittee shall submit an annual report which specify the total organic compound emissions from this emissions unit. These reports shall be submitted by January 31 of each year and cover the previous calendar year.

E. Testing Requirements

1. Emissions Limitation:

The total combined VOC emissions from emissions units R001 and R002 shall not exceed 12.0 TPY, based on a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the VOC emissions limitation shall be demonstrated by the recordkeeping required in Section C.1
2. Emissions Limitation:

The VOC content of the adhesive materials employed in emissions units R001 shall not exceed 5.41 pounds of VOC per gallon of adhesive.

Applicable Compliance Method:

Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the liquid organic materials.
3. Compliance with the usage limit in section B.2 shall be determined by the records in section C.1.
4. Compliance with the HAPs emissions limitation outlined in term A.2.a shall be demonstrated by the recordkeeping in section C.2.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A, B,C.1, C.2, D and E.1.