

Facility ID: 1483040158 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: 1483040158 Emissions Unit ID: P001 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>
12,571 lbs/hour black dyed facer material - wet end processing area with 3 steam heated drying drums	OAC rule 3745-31-05(A)(3) (PTI 14-04855)	19.76 lbs of organic compound (OC) emissions/hour* 86.55 tons per year (TPY) of OC emissions 0.23 lb of hydrochloric acid (HCl) emissions/hour* 1.01 TPY of HCl emissions See Section A.2 below.

* The hourly emission limitations specified in this permit are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.

Exempt, see Section B.1 below.

OAC rule 3745-21-07(G)(2)

2. Additional Terms and Conditions

- (a) The HCl content of the black dye shall not exceed 0.005 lb of HCl/lb of black dye, as applied (weight percent basis).
The OC content of the black dye shall not exceed 0.35 lb of OC/lb of black dye, as applied (weight percent basis).
The OC contents of the raw materials and chemical additives shall not exceed the following amounts:
 - i. 0.54 lb of OC/gallon of PC925 material, as applied;
 - ii. 0.0003 lb of OC/lb, of latex material, as applied;
 - iii. 0.24 lb of OC/lb of retention aid material, as applied; and
 - iv. 0.004 lb of OC/gallon of wet strength material, as applied.

B. Operational Restrictions

1. This emissions unit shall not employ any photochemically reactive material as defined in OAC rule 3745-21-01(C)(5). Therefore, it is exempt from the emission limitations specified in OAC rule 3745-21-07(G)(2).

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information each month for this emissions unit:
 - a. the company identification of each organic material employed in this emissions unit;
 - b. a record for each organic material employed, indicating whether or not the organic material is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the amount, in pounds, of each black dye employed;
 - d. the amount, in gallons, of each PC925 material employed;
 - e. the amount, in gallons, of each wet strength material employed;

- f. the amount, in pounds, of each latex material employed;
 - g. the amount, in pounds, of each retention aid material employed;
 - h. the HCl content of each black dye, as applied, in pounds of HCl per pound of black dye;
 - i. the OC content of each black dye, as applied, in pounds of OC per pound of black dye;
 - j. the OC content of each PC925 material, as applied, in pounds of OC/gallon;
 - k. the OC content, of each retention aid material, as applied, in pounds of OC/pound;
 - l. the OC content of each latex material, as applied, in pounds of OC/pound;
 - m. the OC content, of each wet strength material, as applied, in pounds of OC/gallon;
 - n. the OC emissions, in pounds, from the black dye [the summation of (c) x (i) for all black dye employed during the calendar month];
 - o. the OC emissions, in pounds, from the PC925 material [the summation of (d) x (j) for all PC925 material employed during the calendar month];
 - p. the OC emissions, in pounds, from the wet strength material [the summation of (e) x (m) for all wet strength material employed during the calendar month];
 - q. the OC emissions, in pounds, from the latex material [the summation of (f) x (l) for all latex material employed during the calendar month];
 - r. the OC emissions, in pounds, from the retention aid material [the summation of (g) x (k) for all retention aid material employed during the calendar month];
 - s. the total OC emissions, in pounds [the summation of (n + o + p + q + r) for the calendar month]; and
 - t. the total HCl emissions, in pounds [the summation of (c) x (h) for all black dye employed during the calendar month].
2. The permittee shall maintain annual records of the following information for this emissions unit:
- a. the total OC emissions, in tons, for the calendar year (summation of C.1.s for each month of the calendar year, and divided by 2,000 lbs/ton); and
 - b. the total HCl emissions, in tons, for the calendar year (summation of C.1.t for each month of the calendar year, and divided by 2,000 lbs/ton).
3. The permit to install for this emissions unit was evaluated based on the actual materials employed (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. Ohio EPA's "Review of New Sources of Air Toxics Emissions" policy ("Air Toxics Policy") was applied for each toxic 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).

Pollutant: acetic acid
 TLV (ug/m3): 25,000
 Maximum Hourly Emission Rate (lbs/hr): 12.32
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 401.5
 MAGLC (ug/m3): 595.2

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

- a. changes in the composition of the materials used, or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the 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 Toxics Policy" will be satisfied with the above changes, 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 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. when the 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 Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying materials (i.e., for HCl or OC content, as specified in Section A.2). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
3. The permittee shall submit annual reports that specify the total OC and HCl emissions, in tons, from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the HCl and OC emission limitations specified in Section A.1 and the HCl and OC content limitations specified in Section A.2 shall be determined by the following methods:
Emission Limitations: 0.23 lb of HCl emissions/hour; 19.76 lbs of OC emissions/hour

Applicable Compliance Method: The hourly HCl emission limitation is based on the emissions unit's potential to emit and was established by considering the maximum amount of black dye, in pounds, to be employed in one hour and multiplied the maximum HCl content of the black dye.

If required, the permittee shall demonstrate compliance with the hourly HCl emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 26.

The hourly OC emission limitation is based on the emissions unit's potential to emit and was established by considering the maximum amount of material(s), in pounds (i.e., black dye, PC925, latex, retention aid and wet strength) employed in one hour, multiplied by each material's respective maximum OC content.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A.

Emission Limitations: 1.01 TPY of HCl emissions; 86.55 TPY of OC emissions

Applicable Compliance Method: Compliance with the annual HCl and OC emission limitations shall be determined by the record keeping requirements specified in Section C.2.

HCl and OC Content Limitations: The HCl and OC content limitations shall not exceed the following amounts:

- i. 0.005 lb of HCl/lb of black dye material, as applied (weight percent basis);
- ii. 0.35 lb of OC/lb of black dye material, as applied (weight percent basis);
- iii. 0.54 lb of OC/gallon of PC925 material, as applied;
- iv. 0.0003 lb of OC/lb of latex material, as applied;
- v. 0.24 lb of OC/lb of retention aid material, as applied; and
- vi. 0.004 lb of OC/gallon of wet strength material, as applied.

Applicable Compliance Method: Compliance with the HCl and OC content limitations shall be determined by the record keeping requirements specified in Section C.1. Formulation data or U.S. EPA Method 24 shall be used to determine the OC contents of the black dye, PC925 material, latex material, retention aid material and the wet strength material. Formulation data shall be used to determine the HCl content of the black dye.

F. Miscellaneous Requirements

1. None