

Facility ID: 1652050083 Issuance type: Draft 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: 1652050083 Emissions Unit ID: K001 Issuance type: Draft 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>
Coating line - paper coating, knife over roller process with permanent total enclosure, controlled with catalytic incinerator	OAC rule 3745-21-09(F)	4.8 lbs VOC per gallon of solids
	OAC rule 3745-35-07	See A.2.

2. Additional Terms and Conditions

- (a) Combined annual emissions from this facility shall not exceed the following limitations, as rolling, 12-month summations:
 - 24 tons of combined hazardous air pollutants (HAPs); and
 - 9.9 tons of any individual HAP.

B. Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, 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 (i.e., as of the effective date of this permit, 650 degrees Fahrenheit). The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance (i.e., as of the effective date of this permit, 192 degrees Fahrenheit).
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, whenever the emissions unit is in operation. This value has been determined to be equivalent to 200 fpm average facial velocity at standard temperature.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and indicating devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day for the coating line and control equipment:
 - a. the name and identification number of each coating employed, as applied;
 - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, in percent, as applied, and the volume, in number of gallons, as applied, of each coating;
 - c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
 - d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied. The controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with section C.2.c above and (ii) the overall control efficiency for

the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

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

f. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and

g. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

[Note: all coating information must be for coatings as employed, including any thinning solvents applied at the emissions unit.]

3. For each month, the permittee shall collect and record the following information for the purpose of calculating the rolling, 12-month HAP emissions:

a. the name and identification number of each coating and cleanup material employed, as applied;

b. the number of gallons of each coating and cleanup material employed, as applied;

c. the individual HAP content of each coating and cleanup material employed, as applied, in pounds per gallon;

d. the combined HAPs content of each coating and cleanup material employed, as applied, in pounds per gallon;

e. the total, uncontrolled emissions of each individual HAP from each coating and cleanup material employed, as applied, in pounds or tons;

f. the total, uncontrolled emissions of combined HAPs from each coating and cleanup material employed, as applied, in pounds or tons;

g. the total, uncontrolled emissions of each individual HAP from all coatings and cleanup materials employed, as applied, in pounds or tons;

h. the total, uncontrolled emissions of combined HAPs from all coatings and cleanup materials, as applied, in pounds or tons;

i. the total, controlled emissions of each individual HAP from all coatings and cleanup materials, as applied, in pounds or tons, to be calculated using (i) the total, uncontrolled emissions of individual HAP (section C.3.g) and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

j. the total, controlled emissions of combined HAPs from all coatings and cleanup materials, as applied, in pounds or tons, to be calculated using (i) the total, uncontrolled emissions of combined HAPs (section C.3.h) and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

k. the rolling, 12-month summation of total, controlled emissions of each individual HAP from all coatings and cleanup materials, as applied, in pounds or tons; and

l. the rolling, 12-month summation of total, controlled combined HAPs emissions from all coatings and cleanup materials, as applied, in pounds or tons.

[Note: all coating information must be for coatings as employed, including any thinning solvents applied at the emissions unit.]

4. The permittee shall maintain and operate monitoring devices and a recorder that simultaneously measure and continuously record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

a. the difference in pressure between the permanent total enclosure and the surrounding area(s), on a continuous basis; and

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

D. Reporting Requirements

1. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance (i.e., as of the effective date of this permit, 650 degrees Fahrenheit).

2. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance (i.e., as of the effective date of this permit, 192 degrees Fahrenheit).

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-

month emission limitation for each individual HAP.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for total combined HAPs.
5. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
6. The quarterly deviation (excursion) reports shall be submitted as specified in Part I - General Condition 3 of this permit.
7. The permittee shall submit annual reports that specify the total individual HAP and combined HAPs emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
8. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitation. 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 45 days after the exceedance occurs.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
The emission testing shall be conducted within 6 months prior to permit expiration.
The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC, including a determination of capture efficiency and control efficiency.
The following test method(s) shall be employed to determine the capture efficiency of the control equipment serving this emissions unit: 40 CFR Part 51, Appendix M, Method 204 or 204A-204F (as appropriate). The permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with USEPA's "Guidelines for Determining Capture Efficiency" (published 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(s).
The following test method(s) shall be employed to determine the destruction and removal efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A (as appropriate). The test method shall be selected 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.
The tests 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.
2. Not later than 30 days prior to the proposed test date, 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 and date of the test, and the person who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test.
3. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, 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.
4. A comprehensive written report on the results of the emissions test 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. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
5. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation -
24 TPY of all HAPs for entire facility

Applicable Emission Limitation -
Monthly records shall be maintained of the total HAP content of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials, and the calculated, controlled combined HAPs emission rate for all coatings and cleanup materials employed in this facility.
Emission Limitation -
9.0 TPY of any individual HAP for entire facility

Applicable Emission Limitation -
Monthly records shall be maintained of the individual HAP content of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials, and the calculated, controlled individual HAP emission rate for all coatings and cleanup materials employed in this facility.
6. Method 24 or 24A of 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings, in accordance with OAC rule 3745-21-10(B). If pursuant to section 4.3 of Method 24, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
7. Formulation data, provided by the manufacturer, shall be used to determine the VOC contents of the cleanup materials employed and the individual HAP and combined HAPs contents of the coatings and cleanup materials employed in this emissions unit.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit are federally enforceable: A, B, C, D, E, and F.