

Facility ID: 1652100086 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.

- [Go to Part II for Emissions Unit R001](#)
- [Go to Part II for Emissions Unit R002](#)
- [Go to Part II for Emissions Unit R003](#)
- [Go to Part II for Emissions Unit R004](#)

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Facility ID: 1652100086 Emissions Unit ID: R001 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>
Panel laminating line with reciprocating spray guns and electric drying oven	OAC rule 3745-31-05(A)(3) (PTI #16-01972)	See Sections A.2.a through A.2.c below.
	OAC rule 3745-31-05(C) [Synthetic Minor to avoid Title V and to avoid Prevention of Significant Deterioration (PSD)]	See Sections A.2.d, B.2 and B.3 below.
	OAC rule 3745-21-07(G)(2)	Exempt, see Section section B.1 below.

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 42.3 pounds per hour, nor 63.45 tons per year. Acetone emissions from this emissions unit shall not exceed 42.3 pounds per hour, nor 61.83 tons per year. The VOC content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 2.82 pounds per gallon, as applied. The annual emissions from the entire facility (emissions units R001, R002, R003, and R004, combined) shall not exceed the following, as rolling, 12-month summations:
 - (i) 90.88 tons of VOC;
 - (ii) 23.73 tons of all combined hazardous air pollutants (HAPs); and
 - (iii) 9.76 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not employ any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.
2. The maximum annual adhesive usage for this emissions unit shall not exceed 45,000 gallons, based upon a rolling, 12-month summation of the monthly adhesive usage rates.
3. The total allowable usage [as defined by OAC rule 3745-77-01(BB)] 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 single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and cleanup material employed at this facility.
2. The permittee shall maintain records, on a monthly basis, of the following information for this emissions unit:

- a. the name and identification number of each adhesive, thinner, and cleanup material employed, and documentation of whether or not each material employed is a photochemically reactive material;
 - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
 - c. the total VOC content, in pounds of VOC per gallon, and the total acetone content, in pounds of acetone per gallon, of each adhesive, thinner, and cleanup material employed;
 - d. the calculated total VOC emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - e. The calculated total acetone emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - f. the number of hours the emissions unit was in operation;
 - g. the average hourly VOC and acetone emission rates, in pounds per hour;
 - h. the total adhesive usage rate, in gallons [summation of b for all adhesives]; and
 - i. the rolling, 12-month adhesive usage rate, in gallons.
3. The permittee shall collect and record the following information each month for emissions units R001, R002, R003 and R004, combined:
- a. the company identification of each adhesive, thinner and cleanup material employed;
 - b. the amount of each individual HAP in each adhesive, thinner and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each adhesive, thinner and cleanup material employed;
 - d. the emission rate for each individual HAP from each adhesive, thinner and cleanup material employed (C.3.b x C.3.c) for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the adhesives, thinners and cleanup materials employed (for each individual HAP, the summation of C.3.d for all adhesives, thinners and cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the adhesives, thinners and cleanup materials employed (summation of C.3.e for all HAPs for all adhesive, thinners and cleanup materials, divided by 2000 lbs/ton), in tons;
 - g. the total VOC emissions from all the adhesives, thinners and cleanup materials employed, in tons (summation of the VOC emissions, from section C.2, for emissions units R001 through R004, combined, divided by 2000 lbs/ton);
 - h. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons; and
 - i. the rolling, 12-month VOC emissions, in tons.
4. The permit to install for this emissions unit was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: isopropyl alcohol
- TLV (mg/m3): 491.3
- Maximum Hourly Emission Rate (lbs/hr): 50
- Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 3,934
- MAGLC (ug/m3): 11,698
5. 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 Toxic 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 applying the "Air Toxic 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 or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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.).

6. If the permittee determines that the "Air Toxic 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic 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 Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the hourly VOC and acetone emission limitations of 42.3 pounds (for this emissions unit);

b. all exceedances of the rolling, 12-month adhesive usage limitation of 45,000 gallons (for this emissions unit);

c. all exceedances of the rolling 12-month VOC, individual HAP and combined HAPs emission limitations of 90.88 tons, 9.76 tons, and 23.73 tons, respectively (for emissions units R001 through R004, combined); and

d. all exceedances of the VOC content limitation of 2.82 pounds/gallon (for adhesives, thinners, and cleanup materials).

These reports shall be due by the dates describe in Part I - General Terms and Conditions of this permit.

2. The permittee shall submit annual reports that specify the actual annual VOC emissions (for this emissions unit), the actual annual adhesive usage (for this emissions unit) , and the actual annual VOC emissions, total combined HAPs and individual HAP emissions (for R001, R002, R003, and R004, combined). These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. The permittee shall notify the Director (the Akron RAQMD) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Akron RAQMD) within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations in this permit shall be determined in accordance with the following methods:

Emission Limitation:

42.3 pounds per hour, and 63.45 tons per year VOC

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .2 of this permit.

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .2 of this permit, and shall be the summation of the 12 monthly VOC emission rates for the calendar year, divided by 2000 lbs/ton.

Emission Limitation:

42.3 pounds per hour, and 61.83 tons per year of acetone

Applicable Compliance Method:

Compliance with the hourly allowable acetone emission limitation above shall be demonstrated based on the record keeping requirements established in Section C.2 of this permit.

Compliance with the annual allowable acetone emission limitation above shall be demonstrated based on the record keeping requirements established in Section C.2 of this permit, and shall be the summation of the 12 monthly acetone emission rates for the calendar year, divided by 2000 lbs/ton.

Emission Limitation:

90.88 tons VOC/rolling, 12-month period (for emissions units R001 through R004, combined)

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in Sections C.2 and C.3 of this permit.

Emission Limitation:

9.76 tons of any individual HAP/rolling, 12-month period (for emissions units R001 through R004, combined)

23.73 tons of all combined HAPs/rolling, 12-month period (for emissions units R001 through R004, combined)

Applicable Compliance Method:

Compliance with the annual allowable individual HAP and combined HAPs emission limitations above shall be demonstrated based on the record keeping requirements established in Section C.3 of this permit.
Emission Limitation: 2.42 pounds VOC per gallon, as applied (for each adhesive, thinner and cleanup material)

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.2 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives, thinners, and cleanup materials.
Operational Restriction: 45,000 gallons of adhesive usage per rolling, 12-month period

Applicable Compliance Method

Compliance shall be demonstrated through the record keeping requirements established in of Section C.2 of this permit.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 1652100086 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>
Adhesive booth #1	OAC rule 3745-31-05(A)(3) (PTI #16-01972)	See Sections A.2.a through A.2.e below.
	OAC rule 3745-31-05(C) [Synthetic Minor to avoid Title V and to avoid Prevention of Significant Deterioration (PSD)]	See Sections A.2.f, B.2 and B.3 below.
	OAC rule 3745-21-07(G)(2)	Exempt, see Section section B.1 below.

2. Additional Terms and Conditions

- (a) Hexane emissions from this emissions unit shall not exceed 3.12 pounds per hour, nor 4.88 tons per year.
Toluene emissions from this emissions unit shall not exceed 0.72 pound per hour, nor 1.13 tons per year.
The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 3.96 pounds per hour, nor 6.19 tons per year.
Acetone emissions from this emissions unit shall not exceed 3.96 pounds per hour, nor 4.03 tons per year.
The VOC content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 3.3 pounds per gallon, as applied.
The annual emissions from the entire facility (emissions units R001, R002, R003, and R004, combined) shall not exceed the following, as rolling, 12-month summations:
 - (i) 90.88 tons of VOC;
 - (ii) 23.73 tons of all combined hazardous air pollutants (HAPs); and
 - (iii) 9.76 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not employ any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.
2. The maximum annual adhesive usage for this emissions unit shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the monthly adhesive usage rates.
3. The total allowable usage [as defined by OAC rule 3745-77-01(BB)] 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 single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and cleanup material employed at this facility.
2. The permittee shall maintain records, on a monthly basis, of the following information for this emissions unit:
 - a. the name and identification number of each adhesive, thinner, and cleanup material employed, and documentation of whether or not each material employed is a photochemically reactive material;
 - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
 - c. the total VOC content, in pounds of VOC per gallon, the total acetone content, in pounds of acetone per gallon, the total hexane content, in pounds of hexane per gallon and the total toluene content, in pounds of toluene per gallon of each adhesive, thinner, and cleanup material employed;
 - d. the calculated total VOC emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - e. The calculated total acetone emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - f. The calculated total hexane emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - g. The calculated total toluene emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - h. the number of hours the emissions unit was in operation;
 - j. the average hourly VOC, acetone, hexane, and toluene emission rates, in pounds per hour;
 - k. the total adhesive usage rate, in gallons [summation of b for all adhesives]; and
 - l. the rolling, 12-month adhesive usage rate, in gallons.
3. The permittee shall collect and record the following information each month for emissions units R001, R002, R003 and R004, combined:
 - a. the company identification of each adhesive, thinner and cleanup material employed;
 - b. the amount of each individual HAP in each adhesive, thinner and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each adhesive, thinner and cleanup material employed;
 - d. the emission rate for each individual HAP from each adhesive, thinner and cleanup material employed (C.3.b x C.3.c) for each individual HAP, in lbs;
 - e. the total emission rate for each individual HAP from all the adhesives, thinners and cleanup materials employed (for each individual HAP, the summation of C.3.d for all adhesives, thinners and cleanup materials), in lbs;
 - f. the total HAP emission rate for all HAPs combined from all the adhesives, thinners and cleanup materials employed (summation of C.3.e for all HAPs for all adhesive, thinners and cleanup materials, divided by 2000 lbs/ton), in tons;
 - g. the total VOC emissions from all the adhesives, thinners and cleanup materials employed, in tons (summation of the VOC emissions, from section C.2, for emissions units R001 through R004, combined, divided by 2000 lbs/ton);
 - h. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons; and
 - i. the rolling, 12-month VOC emissions, in tons.
4. The permit to install for this emissions unit was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model

or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane

TLV (mg/m3): 176.2

Maximum Hourly Emission Rate (lbs/hr): 25

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 3,456

MAGLC (ug/m3): 4,195

5. 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 Toxic 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 applying the "Air Toxic 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 or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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.).

6. If the permittee determines that the "Air Toxic 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic 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 Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- all exceedances of the hourly VOC and acetone emission limitations of 3.96 pounds (for this emissions unit);
 - all exceedances of the rolling, 12-month adhesive usage limitation of 3,750 gallons (for this emissions unit);
 - all exceedances of the rolling 12-month VOC, individual HAP and combined HAPs emission limitations of 90.88 tons, 9.76 tons, and 23.73 tons, respectively (for emissions units R001 through R004, combined);
 - all exceedances of the VOC content limitation of 3.3 pounds/gallon (for adhesives, thinners, and cleanup materials); and
 - all exceedances of the hourly hexane and toluene emission limitations of 3.12 pounds and 0.72 pound, respectively (for this emissions unit).

These reports shall be due by the dates describe in Part I - General Terms and Conditions of this permit.

2. The permittee shall submit annual reports that specify the actual annual VOC, hexane and toluene emissions (for this emissions unit), the actual annual adhesive usage (for this emissions unit), and the actual annual VOC emissions, total combined HAPs and individual HAP emissions (for R001, R002, R003, and R004, combined). These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Director (the Akron RAQMD) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Akron RAQMD) within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations in this permit shall be determined in accordance with the following methods:
Emission Limitation:
3.96 pounds per hour, and 6.19 tons per year VOC

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .2 of this permit.

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .2 of this permit, and shall be the summation of the 12 monthly VOC emission rates for the calendar year, divided by 2000 lbs/ton.

Emission Limitation:

3.96 pounds per hour, and 4.03 tons per year of acetone

Applicable Compliance Method:

Compliance with the hourly allowable acetone emission limitation above shall be demonstrated based on the record keeping requirements established in Section C.2 of this permit.

Compliance with the annual allowable acetone emission limitation above shall be demonstrated based on the record keeping requirements established in Section C.2 of this permit, and shall be the summation of the 12 monthly acetone emission rates for the calendar year, divided by 2000 lbs/ton.

Emission Limitation:

90.88 tons VOC/rolling, 12-month period (for emissions units R001 though R004, combined)

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in Sections C.2 and C.3 of this permit.

Emission Limitation:

9.76 tons of any individual HAP/rolling, 12-month period (for emissions units R001 though R004, combined)

23.73 tons of all combined HAPs/rolling, 12-month period (for emissions units R001 though R004, combined)

Applicable Compliance Method:

Compliance with the annual allowable individual HAP and combined HAPs emission limitations above shall be demonstrated based on the record keeping requirements established in Section C.3 of this permit.

Emission Limitation: 3.3 pounds VOC per gallon, as applied (for each adhesive, thinner and cleanup material)

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.2 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives, thinners, and cleanup materials.

Operational Restriction: 3,750 gallons of adhesive usage per rolling, 12-month period

Applicable Compliance Method

Compliance shall be demonstrated through the record keeping requirements established in of Section C.2 of this permit.

Emission Limitation:

3.12 pounds per hour, and 4.88 tons per year of hexane

Applicable Compliance Method:

Compliance with the hourly allowable hexane emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .1 of this permit.

Compliance with the annual allowable hexane emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .1 of this permit, and shall be the summation of the 12 monthly hexane emission rates for the calendar year, divided by 2000 lbs/ton.

Emission Limitation:

0.72 pound per hour, and 1.13 tons per year of toluene

Applicable Compliance Method:

Compliance with the hourly allowable toluene emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .1 of this permit.

Compliance with the annual allowable toluene emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .1 of this permit, and shall be the summation of the 12 monthly toluene emission rates for the calendar year, divided by 2000 lbs/ton.

F. Miscellaneous Requirements

1. None

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Facility ID: 1652100086 Emissions Unit ID: R003 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>
Adhesive booth #2	OAC rule 3745-31-05(A)(3) (PTI #16-01972)	See Sections A.2.a through A.2.e below.
	OAC rule 3745-31-05(C) [Synthetic Minor to avoid Title V and to avoid Prevention of Significant Deterioration (PSD)]	See Sections A.2.f, B.2 and B.3 below.
	OAC rule 3745-21-07(G)(2)	Exempt, see Section section B.1 below.

2. Additional Terms and Conditions

- (a) Hexane emissions from this emissions unit shall not exceed 3.12 pounds per hour, nor 4.88 tons per year.
Toluene emissions from this emissions unit shall not exceed 0.72 pound per hour, nor 1.13 tons per year.
The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 3.96 pounds per hour, nor 6.19 tons per year.
Acetone emissions from this emissions unit shall not exceed 3.96 pounds per hour, nor 4.03 tons per year.
The VOC content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 3.3 pounds per gallon, as applied.
The annual emissions from the entire facility (emissions units R001, R002, R003, and R004, combined) shall not exceed the following, as rolling, 12-month summations:
 - (i) 90.88 tons of VOC;
 - (ii) 23.73 tons of all combined hazardous air pollutants (HAPs); and
 - (iii) 9.76 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not employ any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.
2. The maximum annual adhesive usage for this emissions unit shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the monthly adhesive usage rates.
3. The total allowable usage [as defined by OAC rule 3745-77-01(BB)] 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 single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

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

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and cleanup material employed at this facility.
2. The permittee shall maintain records, on a monthly basis, of the following information for this emissions unit:
 - a. the name and identification number of each adhesive, thinner, and cleanup material employed, and documentation of whether or not each material employed is a photochemically reactive material;
 - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
 - c. the total VOC content, in pounds of VOC per gallon, the total acetone content, in pounds of acetone per gallon, the total hexane content, in pounds of hexane per gallon and the total toluene content, in pounds of toluene per gallon of each adhesive, thinner, and cleanup material employed;

- d. the calculated total VOC emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
- e. The calculated total acetone emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
- f. The calculated total hexane emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
- g. The calculated total toluene emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
- h. the number of hours the emissions unit was in operation;
- j. the average hourly VOC, acetone, hexane, and toluene emission rates, in pounds per hour;
- k. the total adhesive usage rate, in gallons [summation of b for all adhesives]; and
- l. the rolling, 12-month adhesive usage rate, in gallons.
3. The permittee shall collect and record the following information each month for emissions units R001, R002, R003 and R004, combined:
- a. the company identification of each adhesive, thinner and cleanup material employed;
- b. the amount of each individual HAP in each adhesive, thinner and cleanup material, in lbs/gallon, as applied;
- c. the number of gallons of each adhesive, thinner and cleanup material employed;
- d. the emission rate for each individual HAP from each adhesive, thinner and cleanup material employed (C.3.b x C.3.c) for each individual HAP, in lbs;
- e. the total emission rate for each individual HAP from all the adhesives, thinners and cleanup materials employed (for each individual HAP, the summation of C.3.d for all adhesives, thinners and cleanup materials), in lbs;
- f. the total HAP emission rate for all HAPs combined from all the adhesives, thinners and cleanup materials employed (summation of C.3.e for all HAPs for all adhesive, thinners and cleanup materials, divided by 2000 lbs/ton), in tons;
- g. the total VOC emissions from all the adhesives, thinners and cleanup materials employed, in tons (summation of the VOC emissions, from section C.2, for emissions units R001 through R004, combined, divided by 2000 lbs/ton);
- h. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons; and
- i. the rolling, 12-month VOC emissions, in tons.
4. The permit to install for this emissions unit was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: hexane
- TLV (mg/m3): 176.2
- Maximum Hourly Emission Rate (lbs/hr): 25
- Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 3,456
- MAGLC (ug/m3): 4,195
5. 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 Toxic 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 applying the "Air Toxic 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 or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).
6. If the permittee determines that the "Air Toxic 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic 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 Toxic Policy" for the change.
- D. Reporting Requirements**
1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the hourly VOC and acetone emission limitations of 3.96 pounds (for this emissions unit);
- b. all exceedances of the rolling, 12-month adhesive usage limitation of 3,750 gallons (for this emissions unit);
- c. all exceedances of the rolling 12-month VOC, individual HAP and combined HAPs emission limitations of 90.88 tons, 9.76 tons, and 23.73 tons, respectively (for emissions units R001 through R004, combined);
- d. all exceedances of the VOC content limitation of 3.3 pounds/gallon (for adhesives, thinners, and cleanup materials); and
- e. all exceedances of the hourly hexane and toluene emission limitations of 3.12 pounds and 0.72 pound, respectively (for this emissions unit).
- These reports shall be due by the dates describe in Part I - General Terms and Conditions of this permit.
2. The permittee shall submit annual reports that specify the actual annual VOC, hexane and toluene emissions (for this emissions unit), the actual annual adhesive usage (for this emissions unit), and the actual annual VOC emissions, total combined HAPs and individual HAP emissions (for R001, R002, R003, and R004, combined). These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Director (the Akron RAQMD) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Akron RAQMD) within 30 days following the end of the calendar month.
- E. Testing Requirements**
1. Compliance with the emission limitations in this permit shall be determined in accordance with the following methods:
- Emission Limitation:
3.96 pounds per hour, and 6.19 tons per year VOC
- Applicable Compliance Method:
Compliance with the hourly allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .2 of this permit.
- Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .2 of this permit, and shall be the summation of the 12 monthly VOC emission rates for the calendar year, divided by 2000 lbs/ton.
- Emission Limitation:
3.96 pounds per hour, and 4.03 tons per year of acetone
- Applicable Compliance Method:
Compliance with the hourly allowable acetone emission limitation above shall be demonstrated based on the record keeping requirements established in Section C.2 of this permit.
- Compliance with the annual allowable acetone emission limitation above shall be demonstrated based on the record keeping requirements established in Section C.2 of this permit, and shall be the summation of the 12 monthly acetone emission rates for the calendar year, divided by 2000 lbs/ton.
- Emission Limitation:
90.88 tons VOC/rolling, 12-month period (for emissions units R001 through R004, combined)
- Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in Sections C.2 and C.3 of this permit.
- Emission Limitation:

9.76 tons of any individual HAP/rolling, 12-month period (for emissions units R001 through R004, combined)

23.73 tons of all combined HAPs/rolling, 12-month period (for emissions units R001 through R004, combined)

Applicable Compliance Method:

Compliance with the annual allowable individual HAP and combined HAPs emission limitations above shall be demonstrated based on the record keeping requirements established in Section C.3 of this permit.
Emission Limitation: 3.3 pounds VOC per gallon, as applied (for each adhesive, thinner and cleanup material)

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.2 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives, thinners, and cleanup materials.
Operational Restriction: 3,750 gallons of adhesive usage per rolling, 12-month period

Applicable Compliance Method

Compliance shall be demonstrated through the record keeping requirements established in of Section C.2 of this permit.

Emission Limitation:

3.12 pounds per hour, and 4.88 tons per year of hexane

Applicable Compliance Method:

Compliance with the hourly allowable hexane emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .1 of this permit.

Compliance with the annual allowable hexane emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .1 of this permit, and shall be the summation of the 12 monthly hexane emission rates for the calendar year, divided by 2000 lbs/ton.

Emission Limitation:

0.72 pound per hour, and 1.13 tons per year of toluene

Applicable Compliance Method:

Compliance with the hourly allowable toluene emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .1 of this permit.

Compliance with the annual allowable toluene emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .1 of this permit, and shall be the summation of the 12 monthly toluene emission rates for the calendar year, divided by 2000 lbs/ton.

F. Miscellaneous Requirements

- 1. None

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

Facility ID: 1652100086 Emissions Unit ID: R004 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>
Finished Parts Wiping	OAC rule 3745-31-05(A)(3) (PTI #16-01972)	See Sections A.2.a through A.2.e below.
	OAC rule 3745-31-05(C)	See Sections A.2.f, B.2 and B.3 below.

[Synthetic Minor to avoid Title V
and to avoid Prevention of
Significant Deterioration (PSD)]

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

Exempt, see Section section B.1 below.

2. Additional Terms and Conditions

- (a) Methyl Ethyl Ketone (MEK) emissions from this emissions unit shall not exceed 4.73 pounds per hour, nor 7.09 tons per year.
Toluene emissions from this emissions unit shall not exceed 2.07 pounds per hour, nor 3.11 tons per year.
The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 10.04 pounds per hour, nor 15.05 tons per year.
Methyl Isobutyl Ketone (MIBK) emissions from this emissions unit shall not exceed 1.01 pounds per hour, nor 1.51 tons per year.
The VOC content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 6.69 pounds per gallon, as applied.
The annual emissions from the entire facility (emissions units R001, R002, R003, and R004, combined) shall not exceed the following, as rolling, 12-month summations:
- (i) 90.88 tons of VOC;
 - (ii) 23.73 tons of all combined hazardous air pollutants (HAPs); and
 - (iii) 9.76 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not employ any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.
 2. The maximum annual adhesive usage for this emissions unit shall not exceed 4,500 gallons, based upon a rolling, 12-month summation of the monthly adhesive usage rates.
 3. The total allowable usage [as defined by OAC rule 3745-77-01(BB)] 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 single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.
- * This assumes that the HAPs emitted are the same as the amount of HAPs used, since all HAPs used evaporate.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and cleanup material employed at this facility.
2. The permittee shall maintain records, on a monthly basis, of the following information for this emissions unit:
 - a. the name and identification number of each adhesive, thinner, and cleanup material employed, and documentation of whether or not each material employed is a photochemically reactive material;
 - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
 - c. the total VOC content, in pounds of VOC per gallon, the total MEK content, in pounds of MEK per gallon, the total MIBK content, in pounds of MIBK per gallon and the total toluene content, in pounds of toluene per gallon of each adhesive, thinner, and cleanup material employed;
 - d. the calculated total VOC emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - e. The calculated total MEK emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - f. The calculated total MIBK emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - g. The calculated total toluene emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - h. the number of hours the emissions unit was in operation;
 - j. the average hourly VOC, MEK, MIBK, and toluene emission rates, in pounds per hour;
 - k. the total adhesive usage rate, in gallons [summation of b for all adhesives]; and
 - l. the rolling, 12-month adhesive usage rate, in gallons.
3. The permittee shall collect and record the following information each month for emissions units R001, R002, R003 and R004, combined:
 - a. the company identification of each adhesive, thinner and cleanup material employed;
 - b. the amount of each individual HAP in each adhesive, thinner and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each adhesive, thinner and cleanup material employed;

- d. the emission rate for each individual HAP from each adhesive, thinner and cleanup material employed (C.3.b x C.3.c) for each individual HAP, in lbs;
- e. the total emission rate for each individual HAP from all the adhesives, thinners and cleanup materials employed (for each individual HAP, the summation of C.3.d for all adhesives, thinners and cleanup materials), in lbs;
- f. the total HAP emission rate for all HAPs combined from all the adhesives, thinners and cleanup materials employed (summation of C.3.e for all HAPs for all adhesive, thinners and cleanup materials, divided by 2000 lbs/ton), in tons;
- g. the total VOC emissions from all the adhesives, thinners and cleanup materials employed, in tons (summation of the VOC emissions, from section C.2, for emissions units R001 through R004, combined, divided by 2000 lbs/ton);
- h. the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons; and
- i. the rolling, 12-month VOC emissions, in tons.
4. The permit to install for this emissions unit was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: light aliphatic solvent naphtha
- TLV (mg/m3): 52.4
- Maximum Hourly Emission Rate (lbs/hr): 9
- Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,238
- MAGLC (ug/m3): 1,247.6
5. 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 Toxic 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 applying the "Air Toxic 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 or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).
6. If the permittee determines that the "Air Toxic 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic 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 Toxic Policy" for the change.
- D. Reporting Requirements**
1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the hourly VOC, MEK, MIBK and toluene emission limitations of 10.04, 4.73, 1.01, and 2.07 pounds, respectively (for this emissions unit);
- b. all exceedances of the rolling, 12-month adhesive usage limitation of 4,500 gallons (for this emissions unit);

c. all exceedances of the rolling 12-month VOC, individual HAP and combined HAPs emission limitations of 90.88 tons, 9.76 tons, and 23.73 tons, respectively (for emissions units R001 through R004, combined); and

d. all exceedances of the VOC content limitation of 6.69 pounds/gallon (for adhesives, thinners, and cleanup materials).

These reports shall be due by the dates describe in Part I - General Terms and Conditions of this permit.

2. The permittee shall submit annual reports that specify the actual annual VOC, MEK, MIBK and toluene emissions (for this emissions unit), the actual annual adhesive usage (for this emissions unit) , and the actual annual VOC emissions, total combined HAPs and individual HAP emissions (for R001, R002, R003, and R004, combined). These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Director (the Akron RAQMD) in writing of any monthly record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the Akron RAQMD) within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations in this permit shall be determined in accordance with the following methods:

Emission Limitation:

10.04 pounds per hour and 15.05 tons per year VOC

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .2 of this permit.

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in Section C .2 of this permit, and shall be the summation of the 12 monthly VOC emission rates for the calendar year, divided by 2000 lbs/ton.

Emission Limitation:

4.73 pounds per hour, and 7.09 tons per year of MEK

Applicable Compliance Method:

Compliance with the hourly allowable MEK emission limitation above shall be demonstrated based on the record keeping requirements established in Section C.2 of this permit.

Compliance with the annual allowable MEK emission limitation above shall be demonstrated based on the record keeping requirements established in Section C.2 of this permit, and shall be the summation of the 12 monthly MEK emission rates for the calendar year, divided by 2000 lbs/ton.

Emission Limitation:

90.88 tons VOC/rolling, 12-month period (for emissions units R001 through R004, combined)

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in Sections C.2 and C.3 of this permit.

Emission Limitation:

9.76 tons of any individual HAP/rolling, 12-month period (for emissions units R001 through R004, combined)

23.73 tons of all combined HAPs/rolling, 12-month period (for emissions units R001 through R004, combined)

Applicable Compliance Method:

Compliance with the annual allowable individual HAP and combined HAPs emission limitations above shall be demonstrated based on the record keeping requirements established in Section C.3 of this permit.

Emission Limitation: 6.69 pounds VOC per gallon, as applied (for each adhesive, thinner and cleanup material)

Applicable Compliance Method: Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.2 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives, thinners, and cleanup materials.

Operational Restriction: 4,500 gallons of adhesive usage per rolling, 12-month period

Applicable Compliance Method

Compliance shall be demonstrated through the record keeping requirements established in of Section C.2 of this permit.

Emission Limitation:

1.01 pounds per hour, and 1.51 tons per year of MIBK

Applicable Compliance Method:

Compliance with the hourly allowable MIBK emission limitation above shall be demonstrated based on the record keeping requirements established in Section C.1 of this permit.

Compliance with the annual allowable MIBK emission limitation above shall be demonstrated based on the record keeping requirements established in Section C.1 of this permit, and shall be the summation of the 12 monthly MIBK emission rates for the calendar year, divided by 2000 lbs/ton.

Emission Limitation:

2.07 pounds per hour, and 3.11 tons per year of toluene

Applicable Compliance Method:

Compliance with the hourly allowable toluene emission limitation above shall be demonstrated based on the record keeping requirements established in Section C.1 of this permit.

Compliance with the annual allowable toluene emission limitation above shall be demonstrated based on the record keeping requirements established in Section C.1 of this permit, and shall be the summation of the 12 monthly toluene emission rates for the calendar year, divided by 2000 lbs/ton.

F. Miscellaneous Requirements

1. None