

Facility ID: 1667020046 Issuance type: Final State Permit To Operate

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

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

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

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Facility ID: 1667020046 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>
P001 - Lapper 1 - Hose reels, adhesive applicators, braders, capstan puller and coilers	OAC rule 3745-31-02(A)(2) PTI #16-02478 Issued 04/26/07	See sections A.2.a and A.2.b below.
	OAC rule 3745-31-05(C)	See B.1.
	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1) OAC rule 3745-21-07(G)(2)	(PE) emissions shall not exceed 0.551 lbs/hr. Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

2. **Additional Terms and Conditions**
  - (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.
 

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.  
The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and combined HAPs, respectively.
4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.
5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

Maximum adhesive Month Usage (gal)	Maximum HAP Emissions (Tons)	Cumulative HAP Emissions (tons)
------------------------------------	------------------------------	---------------------------------

1	1,818	1.8 4
1 - 2	3,636	3.6 8
1 - 3	4,545	4.5 10
1 - 4	5,454	5.4 12
1 - 5	6,364	6.3 14
1 - 6	7,273	7.2 16
1 - 7	9,091	9.0 18
1 - 8	10,050	9.95 20
1 - 9	10,050	9.95 22
1 - 10	10,050	9.95 24
1 - 11	10,050	9.95 24
1 - 12	10,050	9.95 24

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135
3. 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.).
4. 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 annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
  - 2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
    - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
    - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
  - 3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

- 1. Emission Limitations:
  - Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
  - Applicable Compliance Method:
    - The permittee shall demonstrate compliance with the visible PE limitation above in accordance with OAC rule 3745-17-03(B)(1)(a).
    - Emission Limitations:
      - 8.0 lbs OC / hr
      - 40.0 lbs OC/ day
    - Applicable Compliance Method:
      - The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.
      - The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.
    - If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.
    - Emission Limitations:
      - 9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)
      - 24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)
    - Applicable Compliance Method:
      - Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.
      - Emission Limitation:

PE shall not exceed 0.551 lbs/hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with the OAC rule 3745-17-03(B)(10). Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

Facility ID: 1667020046 Emissions Unit ID: P002 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>
P002 - Lapper 2 - Hose reels, adhesive applicators, braders, capstan puller and coilers	OAC rule 3745-31-02(A)(2) PTI #16-02478 Issued 04/26/07	See sections A.2.a and A.2.b below.
	OAC rule 3745-31-05(C)	See B.1.
	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1) OAC rule 3745-21-07(G)(2)	(PE) emissions shall not exceed 0.551 lbs/hr. Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

2. **Additional Terms and Conditions**
  - (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.
 

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.  
The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.
2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and combined HAPS, respectively.
4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.

5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

Month	Maximum adhesive Usage (gal)	Maximum HAP Emissions (Tons)	Cumulative HAP Emissions (tons)
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1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135

3. 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.).

4. 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 annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
- a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
- b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitations:

8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

Emission Limitation:

PE shall not exceed 0.551 lbs/hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with the OAC rule 3745-17-03(B)(10).

Emission Limitations:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the visible PE limitation above in accordance with OAC rule 3745-17-03(B)(1)(a).

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

Facility ID: 1667020046 Emissions Unit ID: P003 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>
P003 - MR 11 Machine 1 - Hose reels, adhesive applicators, braders, capstan puller and coilers	OAC rule 3745-31-02(A)(2) PTI #16-02478 Issued 04/26/07	See sections A.2.a and A.2.b below.
	OAC rule 3745-31-05(C)	See B.1.
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.
 

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year. The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.
2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and combined HAPs, respectively.
4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.
5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

Maximum adhesive Month Usage (gal)	Maximum HAP Emissions (Tons)	Cumulative HAP Emissions (tons)
1	1.818	1.84
1 - 2	3.636	3.68
1 - 3	5.454	4.510
1 - 4	7.273	5.412
1 - 5	9.091	6.314
1 - 6	10.909	7.216
1 - 7	12.727	8.118

- 1 - 8 10,050 9.95 20  
 1 - 9 10,050 9.95 22  
 1 - 10 10,050 9.95 24  
 1 - 11 10,050 9.95 24  
 1 - 12 10,050 9.95 24

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
  
2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135
  
3. 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.).
  
4. 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 annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day  
  
Applicable Compliance Method:  
The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.  
  
The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.  
  
If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitations:  
9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)  
  
Applicable Compliance Method:  
  
Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

Facility ID: 1667020046 Emissions Unit ID: P004 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>
P004 - MR 11 Machine 2 - Hose reels, adhesive applicators, braders, capstan puller and coilers	OAC rule 3745-31-02(A)(2) PTI #16-02478 Issued 04/26/07	See sections A.2.a and A.2.b below.
	OAC rule 3745-31-05(C)	See B.1.
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year. The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.
2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and combined HAPs, respectively.
4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.
5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

Maximum adhesive Month Usage (gal)	Maximum HAP Emissions (Tons)	Cumulative HAP Emissions (tons)
1 - 1,818	1.8	4
1 - 2 3,636	3.6	8
1 - 3 4,545	4.5	10
1 - 4 5,454	5.4	12
1 - 5 6,364	6.3	14
1 - 6 7,273	7.2	16
1 - 7 9,091	9.0	18
1 - 8 10,050	9.95	20
1 - 9 10,050	9.95	22
1 - 10 10,050	9.95	24
1 - 11 10,050	9.95	24
1 - 12 10,050	9.95	24

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

- j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
- k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
- l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135
3. 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.).
4. 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 annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
- a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
- b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.
- E. Testing Requirements**
1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitations:

8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

F. **Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

Facility ID: 1667020046 Emissions Unit ID: P010 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>
P010 - MR 11 Machine 8 - Hose reels, adhesive applicators, braders, capstan puller and coilers	OAC rule 3745-31-02(A)(2) PTI #16-02478 Issued 04/26/07	See sections A.2.a and A.2.b below.
	OAC rule 3745-31-05(C)	See B.1.
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

2. **Additional Terms and Conditions**

- (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.  
The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

B. **Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To

ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based on a rolling, 12 month summation of the monthly adhesive usage rates.
3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and combined HAPS, respectively.
4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.
5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

Maximum adhesive Month Usage (gal)	Maximum HAP Emissions (Tons)	Cumulative HAP Emissions (tons)
1 - 1,818	1.8	4
1 - 2 3,636	3.6	8
1 - 3 4,545	4.5	10
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1 - 5 6,364	6.3	14
1 - 6 7,273	7.2	16
1 - 7 9,091	9.0	18
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1 - 9 10,050	9.95	22
1 - 10 10,050	9.95	24
1 - 11 10,050	9.95	24
1 - 12 10,050	9.95	24

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135
3. 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.).
4. 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 annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility);, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

E. **Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day  
  
Applicable Compliance Method:  
The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.  
  
The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.  
  
If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitations:  
9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)  
  
Applicable Compliance Method:  
  
Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

F. **Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

Facility ID: 1667020046 Emissions Unit ID: P011 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>
P011 - MR 11 Machine 9 - Hose reels, adhesive applicators, braders, capstan puller and coilers	OAC rule 3745-31-02(A)(2) PTI #16-02478 Issued 04/26/07	See sections A.2.a and A.2.b below.
	OAC rule 3745-31-05(C)	See B.1.
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year. The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.
2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and combined HAPs, respectively.
4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.
5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

Maximum Maximum  
adhesive Maximum HAP Cumulative HAP  
Month Usage (gal) Emissions (Tons) Emissions (tons)

1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22

1 - 10 10,050 9.95 24  
 1 - 11 10,050 9.95 24  
 1 - 12 10,050 9.95 24

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.

2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135

3. 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.).
4. 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 annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
- 2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
- 3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

- 1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitations:  
  
8.0 lbs OC / hr  
40.0 lbs OC/ day  
  
Applicable Compliance Method:  
The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.  
  
The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.  
  
If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitations:  
  
9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)  
  
Applicable Compliance Method:  
  
Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

- 1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

**Facility ID: 1667020046 Emissions Unit ID: P012 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>
P012 - MR 11 Machine 10 - Hose reels, adhesive applicators, braders, capstan puller and coilers	OAC rule 3745-31-02(A)(2)	See sections A.2.a and A.2.b below.
	PTI #16-02478 Issued 04/26/07	
	OAC rule 3745-31-05(C)	
	OAC rule 3745-21-07(G)(2)	See B.1.
		Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year. The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.
2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and combined HAPs, respectively.
4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.
5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

Maximum adhesive Month Usage (gal)	Maximum HAP Emissions (Tons)	Maximum Cumulative HAP Emissions (tons)
1 - 1,818	1.8	4
1 - 2,363	3.6	8
1 - 3,454	4.5	10
1 - 4,545	5.4	12
1 - 5,636	6.3	14
1 - 6,727	7.2	16
1 - 7,909	9.0	18
1 - 8,10,050	9.95	20
1 - 9,10,050	9.95	22
1 - 10,10,050	9.95	24
1 - 11,10,050	9.95	24
1 - 12,10,050	9.95	24

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive

materials usage rate, in gallons;

k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and

l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.

2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135

3. 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.).

4. 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 annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
- a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
- b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

#### E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
 Emission Limitations:

8.0 lbs OC / hr  
40.0 lbs OC/ day

**Applicable Compliance Method:**

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

**Applicable Compliance Method:**

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

**Facility ID: 1667020046 Emissions Unit ID: P013 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>
P013 - MR 11 Machine 11 - Hose reels, adhesive applicators, braders, capstan puller and coilers	OAC rule 3745-31-02(A)(2) PTI #16-02478 Issued 04/26/07	See sections A.2.a and A.2.b below.
	OAC rule 3745-31-05(C)	See B.1.
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.
 

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.  
The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and combined HAPs, respectively.
4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.
5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

Maximum adhesive Month Usage (gal)	Maximum HAP Emissions (Tons)	Cumulative HAP Emissions (tons)
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1	1,818	1.8 4
1 - 2	3,636	3.6 8
1 - 3	5,454	4.5 10
1 - 4	5,454	5.4 12
1 - 5	6,364	6.3 14
1 - 6	7,273	7.2 16
1 - 7	9,091	9.0 18
1 - 8	10,050	9.95 20
1 - 9	10,050	9.95 22
1 - 10	10,050	9.95 24
1 - 11	10,050	9.95 24
1 - 12	10,050	9.95 24

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135
3. 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.).
4. 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 annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
  - 2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
    - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
    - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
  - 3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

- 1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitations:  
  
8.0 lbs OC / hr  
40.0 lbs OC/ day  
  
Applicable Compliance Method:  
The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.  
  
The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.  
  
If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitations:  
  
9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)  
  
Applicable Compliance Method:  
  
Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

- 1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

Facility ID: 1667020046 Emissions Unit ID: P016 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>
P016 - Beam Server SO1 - Hose reels, adhesive applicators, braders, capstan puller and coilers	OAC rule 3745-31-02(A)(2) PTI #16-02478 Issued 04/26/07	See sections A.2.a and A.2.b below.
	OAC rule 3745-31-05(C)	See B.1.
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.
 

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year. The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.
2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and combined HAPs, respectively.
4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.
5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

Maximum adhesive Month Usage (gal)	Maximum HAP Emissions (Tons)	Cumulative HAP Emissions (tons)
1	1.8	4
1 - 2	3.6	3.6
1 - 3	4,545	4.5
1 - 4	5,454	5.4
1 - 5	6,364	6.3
1 - 6	7,273	7.2
1 - 7	9,091	9.0
1 - 8	10,050	9.95
1 - 9	10,050	9.95
1 - 10	10,050	9.95
1 - 11	10,050	9.95
1 - 12	10,050	9.95

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
  
2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135
  
3. 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.).
  
4. 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 annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitations:  
  
8.0 lbs OC / hr  
40.0 lbs OC/ day  
  
Applicable Compliance Method:  
The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.  
  
The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.  
  
If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitations:  
  
9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)  
  
Applicable Compliance Method:  
  
Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

Facility ID: 1667020046 Emissions Unit ID: P017 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>
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P017 - Beam Server SO2 - Hose reels, adhesive applicators, braders, capstan puller and coilers OAC rule 3745-31-02(A)(2) PTI #16-02478 Issued 04/26/07 See sections A.2.a and A.2.b below.

OAC rule 3745-31-05(C) See B.1.  
 OAC rule 3745-21-07(G)(2) Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

(a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year. The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.
2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and combined HAPs, respectively.
4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.
5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

Maximum adhesive Month Usage (gal)	Maximum HAP Emissions (Tons)	Cumulative HAP Emissions (tons)
1 - 1,818	1.8	4
1 - 2,366	3.6	8
1 - 3,454	4.5	10
1 - 4,544	5.4	12
1 - 5,634	6.3	14
1 - 6,723	7.2	16
1 - 7,909	9.0	18
1 - 8,105	9.95	20
1 - 9,105	9.95	22
1 - 10,050	9.95	24
1 - 11,050	9.95	24
1 - 12,050	9.95	24

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and

- I. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135
3. 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:
- 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");
  - 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
  - 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.).
4. 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - 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**

- The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
- The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
- The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

- Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
 Emission Limitations:  
  
 8.0 lbs OC / hr  
 40.0 lbs OC/ day  
  
 Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

Facility ID: 1667020046 Emissions Unit ID: P018 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>
P018 - KARG Braider K1 - Hose reels, adhesive applicators, braders, capstan puller and coilers	OAC rule 3745-31-02(A)(2) PTI #16-02478 Issued 04/26/07	See sections A.2.a and A.2.b below.
	OAC rule 3745-31-05(C)	See B.1.
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.
 

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.  
The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.
2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based

on the rolling, 12-month summations of the monthly individual HAP and combined HAPs, respectively.

4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.
5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

	Maximum adhesive Month Usage (gal)	Maximum HAP Emissions (Tons)	Maximum Cumulative HAP Emissions (tons)
1 - 1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	5,454	4.5	10
1 - 4	7,273	5.4	12
1 - 5	9,091	6.3	14
1 - 6	10,909	7.2	16
1 - 7	12,727	8.1	18
1 - 8	14,545	9.0	20
1 - 9	16,364	9.9	22
1 - 10	18,182	10.8	24
1 - 11	19,999	11.7	26
1 - 12	21,818	12.6	28

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.

2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135

3. 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.).
4. 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 annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
- 2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
- 3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

- 1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitations:  
  
8.0 lbs OC / hr  
40.0 lbs OC/ day  
  
Applicable Compliance Method:  
The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.  
  
The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.  
  
If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitations:  
  
9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)  
  
Applicable Compliance Method:  
  
Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

- 1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

Facility ID: 1667020046 Emissions Unit ID: P019 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>
P018 - KARG Braider K2 - Hose reels, adhesive applicators, braders, capstan puller and coilers	OAC rule 3745-31-02(A)(2) PTI #16-02478 Issued 04/26/07	See sections A.2.a and A.2.b below.
	OAC rule 3745-31-05(C)	See B.1.
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.
 

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year. The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.
2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and combined HAPs, respectively.
4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.
5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

Maximum adhesive Month Usage (gal)	Maximum HAP Emissions (Tons)	Cumulative HAP Emissions (tons)
1 - 1,818	1.8	4
1 - 2 3,636	3.6	8
1 - 3 4,545	4.5	10
1 - 4 5,454	5.4	12
1 - 5 6,364	6.3	14
1 - 6 7,273	7.2	16
1 - 7 9,091	9.0	18
1 - 8 10,050	9.95	20
1 - 9 10,050	9.95	22
1 - 10 10,050	9.95	24
1 - 11 10,050	9.95	24
1 - 12 10,050	9.95	24

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

1. The permittee shall collect and record the following information for each month for the entire facility:

- a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.

2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135

3. 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.).
4. 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 annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitations:  
  
8.0 lbs OC / hr  
40.0 lbs OC/ day  
  
Applicable Compliance Method:  
The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.  
  
The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.  
  
If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitations:  
  
9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)  
  
Applicable Compliance Method:  
  
Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

**Facility ID: 1667020046 Emissions Unit ID: P020 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>
P018 - KARG Braider K3 - Hose reels, adhesive applicators, braders, capstan puller	OAC rule 3745-31-02(A)(2) PTI #16-02478 Issued 04/26/07	See sections A.2.a and A.2.b below.

and coilers

OAC rule 3745-31-05(C)  
OAC rule 3745-21-07(G)(2)

See B.1.  
Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.  
The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

- 1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.
- 2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
- 3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and combined HAPs, respectively.
- 4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.
- 5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

Month	Maximum adhesive Usage (gal)	Maximum HAP Emissions (Tons)	Maximum Cumulative HAP Emissions (tons)
1	1,818	1.8	4
2	3,636	3.6	8
3	5,454	4.5	10
4	5,454	5.4	12
5	6,364	6.3	14
6	7,273	7.2	16
7	9,091	9.0	18
8	10,050	9.95	20
9	10,050	9.95	22
10	10,050	9.95	24
11	10,050	9.95	24
12	10,050	9.95	24

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

- 1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive

material.

2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135

3. 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.).

4. 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 annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

#### E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
 Emission Limitations:

8.0 lbs OC / hr  
 40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

**Facility ID: 1667020046 Emissions Unit ID: P021 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>
P018 - KARG Braider K5 - Hose reels, adhesive applicators, braders, capstan puller and coilers	OAC rule 3745-31-02(A)(2) PTI #16-02478 Issued 04/26/07	See sections A.2.a and A.2.b below.
	OAC rule 3745-31-05(C)	See B.1.
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

2. **Additional Terms and Conditions**
  - (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.
 

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.  
The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.
2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and combined HAPs, respectively.

4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.
5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

Maximum adhesive Month Usage (gal)	Maximum HAP Emissions (Tons)	Maximum Cumulative HAP Emissions (tons)
1 - 1,818	1.84	
1 - 2 3,636	3.68	
1 - 3 4,545	4.510	
1 - 4 5,454	5.412	
1 - 5 6,364	6.314	
1 - 6 7,273	7.216	
1 - 7 9,091	9.018	
1 - 8 10,050	9.9520	
1 - 9 10,050	9.9522	
1 - 10 10,050	9.9524	
1 - 11 10,050	9.9524	
1 - 12 10,050	9.9524	

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135
3. 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.).

4. 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 annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
- a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
- b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility);, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
- Emission Limitations:
- 8.0 lbs OC / hr  
40.0 lbs OC/ day
- Applicable Compliance Method:  
The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.
- The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.
- If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.
- Emission Limitations:
- 9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)
- 24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)
- Applicable Compliance Method:
- Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

Facility ID: 1667020046 Emissions Unit ID: P022 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>
P022 - Textile Machine - Hose reels, adhesive applicators, braders, capstan puller and coilers	OAC rule 3745-31-02(A)(2)	See sections A.2.a and A.2.b below.
	PTI #16-02478 Issued 04/26/07	
	OAC rule 3745-31-05(C)	
	OAC rule 3745-21-07(G)(2)	See B.1. Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- (a) The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NOx, CO and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO and SO2 is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year. The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.
2. The maximum annual usage rate of adhesive materials containing methylene chloride shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and combined HAPs, respectively.
4. compliance with the annual adhesive materials shall be based on the rolling, 12-month summation of the monthly adhesive materials usage records.
5. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials containing methylene chloride and the plant-wide emission levels specified in the following Table:

Maximum adhesive Month Usage (gal)	Maximum HAP Emissions (Tons)	Maximum Cumulative HAP Emissions (tons)
1	1,818	1.8
2	3,636	3.6
3	5,454	5.4
4	7,272	7.2
5	9,090	9.0
6	10,908	10.9
7	12,726	12.7
8	14,544	14.5
9	16,362	16.3
10	18,180	18.1
11	19,998	19.9
12	21,816	21.8

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;

- b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.

- 2. The permit to install for this emissions unit P001 through P023 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: MeCl  
 TLV (mg/m3): 173.68  
 Maximum Hourly Emission Rate (lbs/hr): 7.93  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8  
 MAGLC (ug/m3): 4,135

- 3. 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.).

- 4. 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 annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each

year and shall cover the previous calendar year.

2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitations:

8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:  
The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2. C3, and C4.