

Facility ID: 1667050017 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: 1667050017 Emissions Unit ID: N001 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>
Pyrolytic Incinerator	OAC rule 3745-31-05(A)(3) (PTI 16-1205)	0.027 lb/hr of nitrogen oxides
		0.002 lb/hr of sulfur oxides
		0.050 lb/hr of carbon monoxide
	OAC rule 3745-17-07 OAC rule 3745-17-09	0.017 lb/hr of hydrocarbons
		0.013 lb/hr of particulate emissions
		20% opacity as a 6-minute average
		0.10 pound of particulate emissions per 100 pounds of liquid, semi-solid, or solid refuse and salvageable materials charged
See A.2.a below.		

2. **Additional Terms and Conditions**
 - (a) This incinerator, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

B. Operational Restrictions

1. The permittee shall operate the incinerator in accordance with recommendations of the manufacturer.
2. The permittee shall maintain the temperature of the secondary chamber at 1400 degrees Fahrenheit or higher when the emissions unit is operating.

3. The permittee shall not process parts which may contain toxic metals (e.g., lead and mercury).
 4. The permittee shall not process parts or materials containing coatings or plastics which contain halogens (e.g., fluorine, chlorine or bromine).
 5. The permittee shall use the emissions unit to process organic compounds containing only carbon, hydrogen, nitrogen and oxygen.
 6. The permittee shall employ only natural gas as fuel in this emissions unit.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information each day of incinerator operation:
 - a. the amount of materials processed in the incinerator which contain toxic metals and a detailed list of each toxic metal present;
 - b. the amount of materials processed in the incinerator which contain halogens and a detailed list of each halogen present; and
 - c. the amount of organic compounds processed in the incinerator which contain elements other than carbon, hydrogen, nitrogen and oxygen.
- D. Reporting Requirements**
1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the processing of any material in the incinerator that is prohibited in sections B.3 through B.5 of these terms and conditions. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- 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 Limitation:

0.013 lb/hr of particulate emissions

0.10 pound of particulate emissions per 100 pounds of liquid, semi-solid, or solid refuse and salvageable materials charged

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B)(8) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

Emission Limitation:

0.002 lb/hr of sulfur oxides

Applicable Compliance Method:

The sulfur oxides emission limitation is based on the potential to emit. Multiply the emission factor of 0.6 pound of sulfur oxides per million cubic feet of natural gas combusted (AP-42, Table 1.4-2, Fifth Edition) by the maximum million cubic feet of natural gas per hour ($2.94 \times 10E-4$ million cubic feet per hour).

Emission Limitation:

0.017 lb/hr of hydrocarbons

Applicable Compliance Method:

The hydrocarbon emission limitation is based on the potential to emit. Multiply the emission factor of 3.0 pounds of hydrocarbon emissions per ton of waste burned (US EPA Fire SCC 5-02-001-01) by the maximum tons of waste processed per hour (0.005 ton per hour).

Emission Limitation:

0.027 lb/hr of nitrogen oxides

Applicable Compliance Method:

The nitrogen oxides emission limitation is based on the potential to emit. Multiply the emission factor of 3.0 pounds of hydrocarbon emissions per ton of waste burned (US EPA Fire SCC 5-02-001-01) by the maximum tons of waste processed per hour (0.005 ton per hour).

Emission Limitation:

0.050 lb/hr of carbon monoxide

Applicable Compliance Method:

The carbon monoxide emission limitation is based on the potential to emit. Multiply the emission factor of 10 pounds of carbon monoxide emissions per ton of solid waste burned (US EPA Fire SCC 5-02-001-01) by the maximum tons of waste processed per hour (0.005 ton per hour).

Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1) and the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 1667050017 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 - SO1 Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.	OAC rule 3745-31-05(A)(3) PTI 16-0220	*6.1 lbs/hr OC 40.0 lbs/day OC *7.3 tons per year OC
	OAC rule 3745-21-07(G)(2)	* The lbs OC/hour and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations. See 2.a. below
	OAC rule 3745-35-07(B)(1)	See 2.b. below

2. Additional Terms and Conditions

- (a) The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Eaton Corporation (formerly Saint-Gobain Performance Plastics) Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit.
The annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

- 1. The permittee has agreed to accept limitations on daily operating hours to keep the emissions unit daily OC emissions below 40 pounds per day, and the facility-wide MeCl emission rate to less than 9.95 tons per year.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - c. The number of gallons of each coating and photochemically reactive cleanup material employed each hour of the day.
 - d. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - e. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day .

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.4) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;
 - d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials (sum of term C.2.b X C.2.c), in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
3. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
4. These records and all supporting data shall be retained in the companys files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.

D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, individual HAPs, and combined HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the controlled organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual controlled organic compound emissions for each such day.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
4. These deviation (excursion) reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation:

6.1 pounds per hour OC
40 pounds per day
7.3 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 40 pounds per day of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and 2.

Compliance with the 7.3 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and 2 and using the following equation:

$40 \text{ lbs/day} \times 365 \text{ days/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 7.3 \text{ tons/yr OC allowable}$
Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.2 and using the following equation..

$Ls \times Aa \times H \times Me$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

feet/hr x lbs/feet x hrs/day x lbs of MeCl/lb of adhesive applied = lbs of MeCl/day

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.2.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride
 TLV (mg/m3): 173.5 (Converted from the TWA)
 Maximum Hourly Emission Rate (lbs/hr): 2.27*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031
 MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine

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Facility ID: 1667050017 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 - SO2 Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.	OAC rule 3745-31-05(A)(3) PTI 16-0220	*6.1 lbs/hr OC 40.0 lbs/day OC *7.3 tons per year OC
	OAC rule 3745-21-07(G)(2)	* The lbs OC/hour and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations. See 2.a. below
	OAC rule 3745-35-07(B)(1)	See 2.b. below
2. Additional Terms and Conditions		
(a) The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Eaton Corporation (formerly Saint-Gobain Performance Plastics) Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit. The annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.		
B. Operational Restrictions		
1. The permittee has agreed to accept limitations on daily operating hours to keep the emissions unit daily OC emissions below 40 pounds per day, and the facility-wide MeCl emission rate to less than 9.95 tons per year.		
C. Monitoring and/or Record Keeping Requirements		
1. The permittee shall collect and record the following information for each day for the coating operation:		
a. The company identification for each coating and photochemically reactive cleanup material employed.		
b. The number of gallons of each coating and photochemically reactive cleanup material employed.		
c. The number of gallons of each coating and photochemically reactive cleanup material employed each hour of the day.		
d. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.		
e. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day .		
[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]		
2. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.4) for the coating operation:		
a. the company identification for each adhesive/coating and cleanup material employed;		
b. the number of gallons of each adhesive/coating and cleanup material employed;		
c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;		
d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials (sum of term C.2.b X C.2.c), in pounds per month; and,		
e. the calculated rolling 12 month MeCl emission rate.		
3. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).		
4. These records and all supporting data shall be retained in the companys files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.		
D. Reporting Requirements		
1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, individual HAPs, and combined HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.		
2. The permittee shall submit deviation (excursion) reports which include the following information:		
a. An identification of each day during which the controlled organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual controlled organic compound emissions for each such day.		

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
4. These deviation (excursion) reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation:

6.1 pounds per hour OC
40 pounds per day
7.3 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 40 pounds per day of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and 2.

Compliance with the 7.3 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and 2 and using the following equation:

$$40 \text{ lbs/day} \times 365 \text{ days/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 7.3 \text{ tons/yr OC allowable}$$

Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.2 and using the following equation:

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour
Aa = Adhesive application rate in pounds of adhesive applied per foot
H = Hours operated during the day
MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.2.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride
TLV (mg/m3): 173.5 (Converted from the TWA)
Maximum Hourly Emission Rate (lbs/hr): 2.27*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031
MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.
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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in

emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine

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- 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>
P005 - MR11-1 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3) PTI 16-02220	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*.
	OAC rule 3745-21-07(G)(2)	* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations. See 2.a. below.
	OAC rule 3745-35-07(B)(1)	See 2.b. below.

- 2. **Additional Terms and Conditions**
 - (a) The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit. Compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

- 1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;

- c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;
 - d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.
- D. Reporting Requirements**
1. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.
 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
 3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation:

0.83 pound per hour OC
3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

$$0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$$

Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour
Aa = Adhesive application rate in pounds of adhesive applied per foot
H = Hours operated during the day
MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.
- F. Miscellaneous Requirements**
1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride
 TLV (mg/m3): 173.5 (Converted from the TWA)
 Maximum Hourly Emission Rate (lbs/hr): 2.27*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031
 MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.
 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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 its 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.

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

Facility ID: 1667050017 Emissions Unit ID: P006 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>
P006 - MR11-2 Application of reinforcing	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*;

braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.

PTI 16-02220

OAC rule 3745-21-07(G)(2)
OAC rule 3745-35-07(B)(1)

19.92 lbs/day OC*;
3.6 tons per year OC*.

* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

See 2.a. below.

See 2.b. below.

2. Additional Terms and Conditions

- (a) The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit. Compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

- 1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;
 - d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
- 2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
- 3. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
- 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

- 1. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.
- 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
- 3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation:

0.83 pound per hour OC
3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

0.83 lb/hour x 8760 hours/yr x 1 ton/2000 lbs = 3.6 tons/yr OC allowable.

Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation..

$Ls \times Aa \times H \times Me$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

feet/hr x lbs/feet x hrs/day x lbs of MeCl/lb of adhesive applied = lbs of MeCl/day

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m3): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031

MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 its 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.

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

Facility ID: 1667050017 Emissions Unit ID: P007 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>
P007 - MR11-3 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3) PTI 16-02220	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*.
	OAC rule 3745-21-07(G)(2)	See 2.a. below.
	OAC rule 3745-35-07(B)(1)	See 2.b. below.

* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

2. Additional Terms and Conditions

- (a) The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit.
Compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;
 - d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
3. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.

4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation:

0.83 pound per hour OC
3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

$0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$
Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$Ls \times Aa \times H \times Me$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m3): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031

MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 its 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.

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

Facility ID: 1667050017 Emissions Unit ID: P008 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>
P008 - MR11-4 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3) PTI 16-02220	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*.
	OAC rule 3745-21-07(G)(2)	* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations. See 2.a. below.
	OAC rule 3745-35-07(B)(1)	See 2.b. below.

2. Additional Terms and Conditions

- (a) The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit.

Compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;
 - d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
3. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation:

0.83 pound per hour OC
3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

$0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$
Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation..

$Ls \times Aa \times H \times Me$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

feet/hr x lbs/feet x hrs/day x lbs of MeCl/lb of adhesive applied = lbs of MeCl/day

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m3): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031

MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 its 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.

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

Facility ID: 1667050017 Emissions Unit ID: P009 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>
P009 - MR11-5 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3) PTI 16-02220	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*.
	OAC rule 3745-21-07(G)(2)	* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations. See 2.a. below.
	OAC rule 3745-35-07(B)(1)	See 2.b. below.

2. Additional Terms and Conditions

- (a) The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit.
Compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

- 1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;
 - d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
- 2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
- 3. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
- 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

- 1. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.
- 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.

3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation:

0.83 pound per hour OC
3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

0.83 lb/hour x 8760 hours/yr x 1 ton/2000 lbs = 3.6 tons/yr OC allowable.

Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation.:

$Ls \times Aa \times H \times Me$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

feet/hr x lbs/feet x hrs/day x lbs of MeCl/lb of adhesive applied = lbs of MeCl/day

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m3): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031

MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

shall obtain a final permit to install prior to the change.

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 its 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.

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

Facility ID: 1667050017 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 - MR11-6 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3) PTI 16-02220	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*.
	OAC rule 3745-21-07(G)(2)	See 2.a. below.
	OAC rule 3745-35-07(B)(1)	See 2.b. below.

* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

2. Additional Terms and Conditions

- (a) The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit. Compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

- 1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General

Terms and Conditions and Part II, term C.3) for the coating operation:

- a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;
 - d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation:

0.83 pound per hour OC
3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

$0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$
Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation.:

$Ls \times Aa \times H \times Me$

Ls = Line speed in feet per hour
Aa = Adhesive application rate in pounds of adhesive applied per foot
H = Hours operated during the day
MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air

Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride
 TLV (mg/m3): 173.5 (Converted from the TWA)
 Maximum Hourly Emission Rate (lbs/hr): 2.27*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031
 MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.
 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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 its 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.

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

Facility ID: 1667050017 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>
P010 - MR11-6 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3) PTI 16-02220	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*.
	OAC rule 3745-21-07(G)(2)	* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations. See 2.a. below.
	OAC rule 3745-35-07(B)(1)	See 2.b. below.
2. Additional Terms and Conditions		
(a)	The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit. Compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.	
B. Operational Restrictions		
1.	In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.	
C. Monitoring and/or Record Keeping Requirements		
1.	The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:	
a.	the company identification for each adhesive/coating and cleanup material employed;	
b.	the number of gallons of each adhesive/coating and cleanup material employed;	
c.	the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;	
d.	the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,	
e.	the calculated rolling 12 month MeCl emission rate.	
2.	The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).	
3.	These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.	
4.	The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.	
D. Reporting Requirements		
1.	The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.	
2.	The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.	
3.	These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation: 0.83 pound per hour OC 3.6 tons per year OC Applicable Compliance Method: The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc.	

If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

0.83 lb/hour x 8760 hours/yr x 1 ton/2000 lbs = 3.6 tons/yr OC allowable.
Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$L_s \times A_a \times H \times M_e$

L_s = Line speed in feet per hour

A_a = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

M_e = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

feet/hr x lbs/feet x hrs/day x lbs of MeCl/lb of adhesive applied = lbs of MeCl/day

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m3): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031

MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 its 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.

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

Facility ID: 1667050017 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 - MR11-8 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3) PTI 16-02220	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*.
	OAC rule 3745-21-07(G)(2)	* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations. See 2.a. below.
	OAC rule 3745-35-07(B)(1)	See 2.b. below.

2. Additional Terms and Conditions

- (a) The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit. Compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

- 1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;
 - d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.

2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
3. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation:

0.83 pound per hour OC
3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

$0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$
Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation.:

$Ls \times Aa \times H \times Me$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m3): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031

MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 its 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.

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

Facility ID: 1667050017 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>
P012 - MR11-8 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3) PTI 16-02220	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*.

* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

OAC rule 3745-21-07(G)(2) See 2.a. below.

OAC rule 3745-35-07(B)(1) See 2.b. below.

2. Additional Terms and Conditions

- (a) The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit.
Compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
- the company identification for each adhesive/coating and cleanup material employed;
 - the number of gallons of each adhesive/coating and cleanup material employed;
 - the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;
 - the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
3. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation:
- 0.83 pound per hour OC
3.6 tons per year OC
- Applicable Compliance Method:
- The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.
- Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:
- $0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$
- Emission Limitation:
- 9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide
- Applicable Compliance Method:
- Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be

demonstrated through record keeping required in term C.1 and using the following equation:

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot
H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride

TLV (mg/m3): 173.5 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031

MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 its 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.

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

Facility ID: 1667050017 Emissions Unit ID: P014 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>
P014 - MR11-10 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3) PTI 16-02220	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*.
	OAC rule 3745-21-07(G)(2)	See 2.a. below.
	OAC rule 3745-35-07(B)(1)	See 2.b. below.

* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

2. Additional Terms and Conditions

- (a) The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit. Compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;
 - d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
3. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation:

0.83 pound per hour OC
3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

$0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$
Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation..

$Ls \times Aa \times H \times Me$

Ls = Line speed in feet per hour
Aa = Adhesive application rate in pounds of adhesive applied per foot
H = Hours operated during the day
MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride
TLV (mg/m3): 173.5 (Converted from the TWA)
Maximum Hourly Emission Rate (lbs/hr): 2.27*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031
MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 its 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.

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

Facility ID: 1667050017 Emissions Unit ID: P015 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>
P015 - MR11-11 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3) PTI 16-02220	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*.
	OAC rule 3745-21-07(G)(2)	See 2.a. below.
	OAC rule 3745-35-07(B)(1)	See 2.b. below.

* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

2. Additional Terms and Conditions

- (a) The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit. Compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

- 1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks

associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;
 - d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
3. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation:

0.83 pound per hour OC
3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

$0.83 \text{ lb/hr} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$
Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:

$Ls \times Aa \times H \times Me$

Ls = Line speed in feet per hour

Aa = Adhesive application rate in pounds of adhesive applied per foot

H = Hours operated during the day

MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride
 TLV (mg/m3): 173.5 (Converted from the TWA)
 Maximum Hourly Emission Rate (lbs/hr): 2.27*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031
 MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 its 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.

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

Facility ID: 1667050017 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 - MR11-12 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3)	0.83 lb/hr OC*;
	PTI 16-02220	19.92 lbs/day OC*; 3.6 tons per year OC*.
	OAC rule 3745-21-07(G)(2)	* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations. See 2.a. below.
	OAC rule 3745-35-07(B)(1)	See 2.b. below.

2. Additional Terms and Conditions

- (a) The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit. Compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;
 - d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
3. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.

D. Reporting Requirements

1. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation:

0.83 pound per hour OC

3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

$0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$
Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation..

$Ls \times Aa \times H \times Me$

Ls = Line speed in feet per hour
Aa = Adhesive application rate in pounds of adhesive applied per foot
H = Hours operated during the day
MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride
TLV (mg/m3): 173.5 (Converted from the TWA)
Maximum Hourly Emission Rate (lbs/hr): 2.27*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031
MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.
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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed

emissions unit will 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 its 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.

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

Facility ID: 1667050017 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>
P016 - MR11-12 Application of reinforcing braiding to hoses and plastic tubing, using adhesive. Consisting of hose reels, adhesive applicators, braiders, capstan pullers, and reel coilers.	OAC rule 3745-31-05(A)(3) PTI 16-02220	0.83 lb/hr OC*; 19.92 lbs/day OC*; 3.6 tons per year OC*.
	OAC rule 3745-21-07(G)(2)	See 2.a. below.
	OAC rule 3745-35-07(B)(1)	See 2.b. below.

* The lb OC/hour, lbs OC/day, and TPY OC emission limitations are based on the emissions unit's potentials to emit. Therefore, no record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

2. Additional Terms and Conditions

- (a) The emission limitation specified by this rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. The total annual methylene chloride (HAP) emissions from this facility shall not exceed 9.95 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions. To ensure these limits are met, Saint-Gobain Performance Plastics Mantua Facility is committing to meet the operational restrictions listed in Section B of this permit. Compliance with the annual emission limitation for MeCl shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

- 1. In order to demonstrate compliance with the Ohio Air Toxics Policy the Permittee shall convert the egress stacks associated with emissions units P005-P017 to unrestricted vertical stacks with a minimum release height of 7.9248 meters (26 feet). This conversion shall take place within 45 days of the issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each month (see Part I, term A.2, General Terms and Conditions and Part II, term C.3) for the coating operation:
 - a. the company identification for each adhesive/coating and cleanup material employed;
 - b. the number of gallons of each adhesive/coating and cleanup material employed;
 - c. the organic compound and methylene chloride content of each adhesive/coating and cleanup material, in pounds per gallon;

- d. the total organic compound and methylene chloride emission rate for all adhesive/coating and cleanup material employed materials, in pounds per month; and,
 - e. the calculated rolling 12 month MeCl emission rate.
2. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors, and cleanup).
 3. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 4. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.
- D. Reporting Requirements**
1. The records required in section C.1. of this permit may be collected based on facility-wide purchase records, provided the records are complete and adequate to demonstrate compliance with the terms and conditions of this permit. Any material purchased shall be considered emitted in the month it was purchased.
 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitations for methylene chloride (HAP) and combined HAPs and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission methylene chloride (HAP) and combined HAPs levels.
 3. These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 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 Limitation:

0.83 pound per hour OC
3.6 tons per year OC

Applicable Compliance Method:

The emission calculation where supplied by the permittee through their consultant Emerald Environmental Inc. If required, compliance with this mass emission limitation shall be based on stack testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Compliance with the 3.6 tons per year of OC emissions limitation shall be demonstrated through record keeping required in terms C.1 and using the following equation:

$$0.83 \text{ lb/hour} \times 8760 \text{ hours/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons/yr OC allowable.}$$

Emission Limitation:

9.95 tons per rolling 12-month period of methylene chloride facility wide
24.0 ton per year of all HAPs facility wide

Applicable Compliance Method:

Compliance of the 9.95 tons per rolling 12-month period of methylene chloride facility wide limitation shall be demonstrated through record keeping required in term C.1 and using the following equation:.

$$Ls \times Aa \times H \times Me$$

Ls = Line speed in feet per hour
Aa = Adhesive application rate in pounds of adhesive applied per foot
H = Hours operated during the day
MeCl = MeCl content of the adhesives in lbs of MeCl/lb of adhesive applied

$$\text{feet/hr} \times \text{lbs/feet} \times \text{hrs/day} \times \text{lbs of MeCl/lb of adhesive applied} = \text{lbs of MeCl/day}$$

A summation of these daily and monthly records will be sufficient to demonstrate compliance with the annual limitation. MeCl is the only HAP employed in this emissions unit and is the only HAP requiring record keeping.

Compliance of the 24.0 ton per year of all HAPs facility wide shall be demonstrated through record keeping required in term C.
- F. Miscellaneous Requirements**
1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by all of the emissions units included in this permit to install using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: methylene chloride
TLV (mg/m3): 173.5 (Converted from the TWA)
Maximum Hourly Emission Rate (lbs/hr): 2.27*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,031
MAGLC (ug/m3): 4,131

* This was modeled for emissions units P003 through P017 combined.

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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 its 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.