Facility ID: 1667060132 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.

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

**Facility ID: 1667060132 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| Latex dipping line with oven | OAC rule 3745-31-05 (PTI 16-1716) | 8.0 lbs/hr organic compounds (OC) |
| | OAC rule 3745-21-07(G) | See section B below. |

2. **Additional Terms and Conditions**

   (a) None

B. **Operational Restrictions**

1. The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-07(C)(5) in this emissions unit.

2. The permittee shall not allow any liquid organic material to come into contact with flame or be baked, heat-cured, or heat-polymerized in the presence of oxygen.

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

1. The permittee shall collect and record the following information each day for the dipping line:

   a. the company identification for each dipping material employed;

   b. the number of gallons of each dipping material employed;

   c. the organic compound content of each dipping material, in pounds per gallon;

   d. the total number of hours the emissions unit was in operation; and

   e. the average hourly organic compound emission rate for all dipping materials, in pounds per hour (average).

2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant(s):

   Pollutant: ethyl alcohol

   TLV (ug/m3): 1880
   Maximum Hourly Emission Rate (lbs/hr): 8.0
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 398.3
   MAGLC (ug/m3): 44,762

   Pollutant: ethyl acetate

   TLV (ug/m3): 1440

Maximum Hourly Emission Rate (lbs/hr): 8.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 398.3
MAGLC (ug/m3): 34,286

Pollutant: methanol

TLV (ug/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 8.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 398.3
MAGLC (ug/m3): 6,238
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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
If the permittee determines that the "Air 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.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the average hourly total organic compound emissions exceeded 8.0 pounds per hour, and the actual average hourly organic compound emissions for each such day.

2. The deviation reports shall be submitted as specified in General Condition 3 of this permit.

3. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

8.0 pounds per hour organic compounds

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of section C.1 of these terms and conditions.

Formulation data or USEPA Method 24 or 24A shall be used to determine the organic content of each dipping material.

F. **Miscellaneous Requirements**

1. None