

Facility ID: 1677000239 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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THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1677000239 Emissions Unit ID: K001 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>
Installation of aircraft de-icing systems process	OAC rule 3745-31-05 (PTI 16-1647)	See A.2.a through A.2.d below.
	OAC rule 3745-21-07(G)	8 lbs/hr of organic material 40 lbs/day of organic material

2. Additional Terms and Conditions

- (a) The permittee shall employ best available technology (BAT) to reduce facility-wide emissions of both organic material and hazardous air pollutants (HAP). The control technology shall include the following:
 - i. use of adhesive/paint stripper solvents containing no HAP;
 - ii. solvent-thinning of any adhesive/paint strippers, adhesives, trim cements, prepping/tackifying materials, or cleanup materials employed shall be prohibited;
 - iii. hand rags and any other article used for stripping, cleanup, etc., shall be placed in a closed/sealed container, when not in use or for proper disposal, to reduce organic material and HAP emissions; and
 - iv. compliance with the Ohio EPA "Air Toxics Policy".
The average hourly facility-wide emissions of toluene shall not exceed 13.7 lbs/hr (see Section F.5 below).
Facility-wide emissions of individual HAP shall not exceed 9.9 tons per year (TPY), based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Maximum Allowable Facility-Wide Cumulative Emissions of Individual HAP's (Tons)

1-0	0.8
1-2	1.6
1-3	2.5
1-4	3.3
1-5	4.1
1-6	5.0
1-7	5.8
1-8	6.6
1-9	7.4
1-10	8.2
1-11	9.1
1-12	9.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the maximum annual facility-wide individual HAP emission limitation shall be based upon a rolling, 12-month summation of the monthly emissions.
Facility-wide emissions of total combined HAP's shall not exceed 14.6 TPY, based upon a rolling, 12-

month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Maximum Allowable Facility-Wide Cumulative Emissions of Total Combined HAP (tons)

1	1.2
1-2	2.4
1-3	3.6
1-4	4.9
1-5	6.1
1-6	7.3
1-7	8.5
1-8	9.7
1-9	11.0
1-10	12.2
1-11	13.4
1-12	14.6

After the first 12 calendar months of operation following the issuance of this permit, compliance with the maximum annual facility-wide total combined HAP emission limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each calendar month the following information to determine organic material emissions from emissions unit K001 (monthly invoice records or any accurate and convenient method of tracking emissions, via usage/recycling, on a per emissions unit K001 basis shall be utilized; formulation data may be used where applicable):
 - a. the name and company identification of each prepping material, tackifying material, adhesive, trim cement, and cleanup material employed;
 - b. the organic material content of each prepping material employed, in pounds of organic material per gallon of prepping material;
 - c. the number of gallons of each prepping material employed;
 - d. the organic material content of each tackifying material employed, in pounds of organic material per gallon of tackifying material;
 - e. the number of gallons of each tackifying material employed;
 - f. the organic material content of each adhesive employed, in pounds of organic material per gallon of adhesive;
 - g. the number of gallons of each adhesive employed;
 - h. the organic material content of each trim cement employed, in pounds of organic material per gallon of trim cement;
 - i. the number of gallons of each trim cement employed;
 - j. the organic material content of each cleanup material employed, in pounds of organic material per gallon of cleanup material;
 - k. the number of gallons of each cleanup material employed;
 - l. the total number of hours and days the emissions unit was in operation; and
 - m. the average hourly and average daily organic material emissions, from all prepping materials, tackifying materials, adhesives, trim cements, and cleanup materials employed, in lbs/hr and lbs/day, respectively.

2. The permittee shall collect and record each calendar month the following information to determine facility-wide emissions of individual HAP (monthly invoice records or any accurate and convenient method of tracking emissions, via usage/recycling, on a facility-wide basis shall be utilized; formulation data may be used where applicable):
 - a. the individual HAP content for each HAP of each prepping material employed, in pounds of individual HAP per gallon of prepping material;
 - b. the number of gallons of each prepping material employed;
 - c. the individual HAP content for each HAP of each tackifying material employed, in pounds of individual HAP per gallon of tackifying material;
 - d. the number of gallons of each tackifying material employed;
 - e. the individual HAP content for each HAP of each adhesive employed, in pounds of individual HAP per gallon of adhesive;
 - f. the number of gallons of each adhesive employed;

- g. the individual HAP content for each HAP of each trim cement employed, in pounds of individual HAP per gallon of trim cement;
 - h. the number of gallons of each trim cement employed;
 - i. the individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon of cleanup material;
 - j. the number of gallons of each cleanup material employed;
 - k. the monthly facility-wide emissions of each individual HAP, in tons/month, from all prepping materials, tackifying materials, adhesives, trim cements, and cleanup materials employed;
 - l. during the first 12 calendar months of operation, following the issuance of this permit, cumulative of monthly facility-wide individual HAP emissions, in tons; and
 - m. after the first 12 calendar months of operation, following the issuance of this permit, a summation of the previous 12 calendar months of monthly facility-wide individual HAP emissions, in TPY.
- 3. The permittee shall collect and record each calendar month the following information to determine facility-wide emissions of total combined HAP (monthly invoice records or any accurate and convenient method of tracking emissions, via usage/recycling, on a facility-wide basis shall be utilized; formulation data may be used where applicable):
 - a. the total combined HAP content of each prepping material employed, in pounds of total combined HAP per gallon of prepping material;
 - b. the number of gallons of each prepping material employed;
 - c. the total combined HAP content of each tackifying material employed, in pounds of total combined HAP's per gallon of tackifying material;
 - d. the number of gallons of each tackifying material employed;
 - e. the total combined HAP content of each adhesive employed, in pounds of total combined HAP per gallon of adhesive;
 - f. the number of gallons of each adhesive employed;
 - g. the total combined HAP content of each trim cement employed, in pounds of total combined HAP per gallon of trim cement;
 - h. the number of gallons of each trim cement employed;
 - i. the total combined HAP content of each cleanup material employed, in pounds of total combined HAP per gallon of cleanup material;
 - j. the number of gallons of each cleanup material employed;
 - k. the monthly facility-wide emissions of total combined HAP, in tons/month, from all prepping materials, tackifying materials, adhesives, trim cements, and cleanup materials employed;
 - l. during the first 12 calendar months of operation following the issuance of this permit, cumulative of monthly facility-wide total combined HAP emissions, in tons; and
 - m. after the first 12 calendar months of operation following the issuance of this permit, a summation of the previous 12 calendar months of monthly facility-wide total combined HAP emissions, in TPY.
- 4. The permittee shall collect and record each calendar month the following information to determine facility-wide emissions of toluene (information from the individual HAP recordkeeping above shall be utilized):
 - a. the monthly facility-wide emissions of toluene (an individual HAP), in pounds/month;
 - b. the monthly facility operating time, in hours/month; and
 - c. the average hourly facility-wide emissions of toluene, in pounds/hour.
- D. **Reporting Requirements**
 - 1. The permittee shall submit deviation (excursion) reports which identify each calendar month during which the average hourly and/or the average daily organic material emissions exceeded the respective allowable organic material emission rates of 8 lbs/hr and/or 40 lbs/day, for this emissions unit.
 - 2. The permittee shall submit deviation (excursion) reports identifying each calendar month of the first 12 calendar months of operation, after the issuance of this permit, during which the cumulative of monthly facility-wide individual HAP emissions exceeded the maximum allowable cumulative of monthly facility-wide emissions of individual HAP.
 - 3. The permittee shall submit deviation (excursion) reports identifying each rolling, 12-month year, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide individual HAP emissions exceeded the maximum allowable annual facility-wide individual HAP emission rate of 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions.
 - 4. The permittee shall submit deviation (excursion) reports identifying each calendar month of the first 12 calendar months of operation, after the issuance of this permit, during which the cumulative of monthly facility-wide total combined HAP emissions exceeded the maximum allowable cumulative of monthly facility-wide emissions of total combined HAP.

5. The permittee shall submit deviation (excursion) reports identifying each rolling, 12-month year, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide total combined HAP emissions exceeded the maximum allowable annual facility-wide total combined HAP emission rate of 14.6 TPY, based upon a rolling, 12-month summation of the monthly emissions.
6. The permittee shall submit deviation (excursion) reports which identify each calendar month during which the average hourly facility-wide toluene emissions exceeded the maximum allowable facility-wide toluene emission rate of 13.7 lbs/hr.
7. The deviation reports shall be submitted in accordance with the requirements specified in Part 1 - General Term and Condition 3.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
Formulation data or USEPA Methods 24/24A shall be used to determine the organic material and HAP contents of the adhesive/paint strippers, prepping materials, tackifying materials, adhesives, trim cements, and cleanup materials.
Emission Limitations:

8 lbs/hr of organic material
40 lbs/day of organic material

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitations based upon the record keeping requirements of Section C.1.
Emission Limitation:

13.7 lbs/hr toluene

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements of Section C.4.
Emission Limitation:

Maximum allowable cumulative of monthly facility-wide individual HAP emissions for the first 12 calendar months of operation following the issuance of this permit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements of Section C.2.
Emission Limitation:

Maximum allowable annual facility-wide individual HAP emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.2.
Emission Limitation:

Maximum allowable cumulative of monthly facility-wide total combined HAP emissions for the first 12 calendar months of operation following the issuance of this permit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements of Section C.3.
Emission Limitation:

Maximum allowable annual facility-wide total combined HAP emissions after the first 12 calendar months of operation following the issuance of this permit shall not exceed 14.6 TPY, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements of Section C.3.

F. Miscellaneous Requirements

1. The permittee is hereby notified that this permit and all agency records concerning this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
2. The permittee shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of this emissions unit.
3. This permit allows the use of the organic materials specified by the permittee in the application for PTI 16-1647. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the facility-wide toluene emission limitation specified in the table below was derived in accordance with the Ohio EPA's "Air Toxics

Policy" ("A.T.P."), based on the toluene usage rate, formulation data, and the volume source parameters of the facility building (there are no stacks or egress points for the emissions units), as specified in the permit application. Compliance with the Ohio EPA's "A.T.P." was demonstrated for toluene based on the Screen3 model and a comparison of 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 facility-wide emissions of toluene:

Pollutant: toluene (CAS 108-88-3)

TWA (ug/m3): 188,000

Facility-wide Maximum Allowable Average Hourly Emission Rate (lbs/hr): 13.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4460

MAGLC (ug/m3): 4476

4. Any of the following changes may be deemed a "modification" to the emissions unit(s) and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI 16-1647 and the operating permit:
 - any changes in the composition of the adhesive/paint strippers, prepping, tackifying, or cleanup materials, adhesives, or trim cements, or the use of new adhesive/paint strippers, prepping, tackifying, or cleanup materials, adhesives, or trim cements, that would result in the emission of a compound with a lower Time-Weighted Average (TWA) threshold level, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TWA value specified in the above table;
 - any change in the emission rate(s) of the emissions unit(s) or the volume source parameters of the facility building that would result in an exceedance of any MAGLC specified in the above table;
 - any change to any emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
 - any change in the composition of the adhesive/paint strippers, prepping, tackifying, or cleanup materials, adhesives, or trim cements, or use of new adhesive/paint strippers, prepping, tackifying, or cleanup materials, adhesives, or trim cements, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
 - any change in the composition of the adhesive/paint strippers, prepping, tackifying, or cleanup materials, adhesives, or trim cements, or the use of new adhesive/paint strippers, prepping, tackifying, or cleanup materials, adhesives, or trim cements, that would result in additional and/or increased emissions of any HAP as defined in OAC rule 3745-77-01(V).

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Facility ID: 1677000239 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Removal of aircraft de-icing systems process	OAC rule 3745-31-05 (PTI 16-1647)	See A.2.a through A.2.d below.
	OAC rule 3745-21-07	8 lbs/hr of organic material 40 lbs/day of organic material

2. Additional Terms and Conditions

- (a) The permittee shall employ best available technology (BAT) to reduce facility-wide emissions of both organic material and hazardous air pollutants (HAP). The control technology shall include the following:
 - i. use of adhesive/paint stripper solvents containing no HAP;
 - ii. solvent-thinning of any adhesive/paint strippers, adhesives, trim cements, prepping/tackifying materials, or cleanup materials employed shall be prohibited;

iii. hand rags and any other article used for stripping, cleanup, etc., shall be placed in a closed/sealed container, when not in use or for proper disposal, to reduce organic material and HAP emissions; and

iv. compliance with the Ohio EPA "Air Toxics Policy".
 The average hourly facility-wide emissions of toluene shall not exceed 13.7 lbs/hr (see Section F.5 below).
 Facility-wide emissions of individual HAP shall not exceed 9.9 tons per year (TPY), based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Maximum Allowable Facility-Wide Cumulative Emissions of Individual HAP (Tons)

- 1 0.8
- 1-2 1.6
- 1-3 2.5
- 1-4 3.3
- 1-5 4.1
- 1-6 5.0
- 1-7 5.8
- 1-8 6.6
- 1-9 7.4
- 1-10 8.2
- 1-11 9.1
- 1-12 9.9

After the first 12 calendar months of operation following the issuance of this permit, compliance with the maximum annual facility-wide individual HAP emission limitation shall be based upon a rolling, 12-month summation of the monthly emissions.
 Facility-wide emissions of total combined HAP's shall not exceed 14.6 TPY, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) Maximum Allowable Facility-Wide Cumulative Emissions of Total Combined HAP (tons)

- 1 1.2
- 1-2 2.4
- 1-3 3.6
- 1-4 4.9
- 1-5 6.1
- 1-6 7.3
- 1-7 8.5
- 1-8 9.7
- 1-9 11.0
- 1-10 12.2
- 1-11 13.4
- 1-12 14.6

After the first 12 calendar months of operation following the issuance of this permit, compliance with the maximum annual facility-wide total combined HAP emission limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each calendar month the following information to determine organic material emissions from emissions unit P001 (monthly invoice records or any accurate and convenient method of tracking emissions, via usage/recycling, on a per emissions unit P001 basis shall be utilized; formulation data may be used where applicable):
 - a. the name and company identification of each adhesive/paint stripper and cleanup material employed;
 - b. the organic material content of each adhesive/paint stripper employed, in pounds of organic material per gallon of adhesive/paint stripper;
 - c. the number of gallons of each adhesive/paint stripper employed;
 - d. the organic material content of each cleanup material employed, in pounds of organic material per gallon of cleanup material;
 - e. the number of gallons of each cleanup material employed;
 - f. the total number of hours and days the emissions unit was in operation; and
 - g. the average hourly and average daily organic material emissions, from all adhesive/paint strippers and cleanup materials employed, in lbs/hr and lbs/day, respectively.
2. The permittee shall collect and record each calendar month the following information to determine facility-wide emissions of individual HAP (monthly invoice records or any accurate and convenient method of tracking emissions, via usage/recycling, on a facility-wide basis shall be utilized; formulation data may be used where

applicable):

- a. the individual HAP content for each HAP of each prepping material employed, in pounds of individual HAP per gallon of prepping material;
 - b. the number of gallons of each prepping material employed;
 - c. the individual HAP content for each HAP of each tackifying material employed, in pounds of individual HAP per gallon of tackifying material;
 - d. the number of gallons of each tackifying material employed;
 - e. the individual HAP content for each HAP of each adhesive employed, in pounds of individual HAP per gallon of adhesive;
 - f. the number of gallons of each adhesive employed;
 - g. the individual HAP content for each HAP of each trim cement employed, in pounds of individual HAP per gallon of trim cement;
 - h. the number of gallons of each trim cement employed;
 - i. the individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon of cleanup material;
 - j. the number of gallons of each cleanup material employed;
 - k. the monthly facility-wide emissions of each individual HAP, in tons/month, from all prepping materials, tackifying materials, adhesives, trim cements, and cleanup materials employed;
 - l. during the first 12 calendar months of operation, following the issuance of this permit, cumulative of monthly facility-wide individual HAP emissions, in tons; and
 - m. after the first 12 calendar months of operation following the issuance of this permit, a summation of the previous 12 calendar months of monthly facility-wide individual HAP emissions, in TPY.
3. The permittee shall collect and record each calendar month the following information to determine facility-wide emissions of total combined HAP (monthly invoice records or any accurate and convenient method of tracking emissions, via usage/recycling, on a facility-wide basis shall be utilized; formulation data may be used where applicable):
- a. the total combined HAP content of each prepping material employed, in pounds of total combined HAP per gallon of prepping material;
 - b. the number of gallons of each prepping material employed;
 - c. the total combined HAP content of each tackifying material employed, in pounds of total combined HAP per gallon of tackifying material;
 - d. the number of gallons of each tackifying material employed;
 - e. the total combined HAP content of each adhesive employed, in pounds of total combined HAP per gallon of adhesive;
 - f. the number of gallons of each adhesive employed;
 - g. the total combined HAP content of each trim cement employed, in pounds of total combined HAP per gallon of trim cement;
 - h. the number of gallons of each trim cement employed;
 - i. the total combined HAP content of each cleanup material employed, in pounds of total combined HAP per gallon of cleanup material;
 - j. the number of gallons of each cleanup material employed;
 - k. the monthly facility-wide emissions of total combined HAP, in tons/month, from all prepping materials, tackifying materials, adhesives, trim cements, and cleanup materials employed;
 - l. during the first 12 calendar months of operation following the issuance of this permit, cumulative of monthly facility-wide total combined HAP emissions, in tons; and
 - m. after the first 12 calendar months of operation following the issuance of this permit, a summation of the previous 12 calendar months of monthly facility-wide total combined HAP emissions, in TPY.
4. The permittee shall collect and record each calendar month the following information to determine facility-wide emissions of toluene (information from the individual HAP recordkeeping above shall be utilized):
- a. the monthly facility-wide emissions of toluene (an individual HAP), in pounds/month;
 - b. the monthly facility operating time, in hours/month; and
 - c. the average hourly facility-wide emissions of toluene, in pounds/hour.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which identify each calendar month during which the

average hourly and/or the average daily organic material emissions exceeded the respective allowable organic material emission rates of 8 lbs/hr and/or 40 lbs/day, for this emissions unit.

2. The permittee shall submit deviation (excursion) reports identifying each calendar month of the first 12 calendar months of operation, after the issuance of this permit, during which the cumulative of monthly facility-wide individual HAP emissions exceeded the maximum allowable cumulative of monthly facility-wide emissions of individual HAP.
3. The permittee shall submit deviation (excursion) reports identifying each rolling 12-month year, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide individual HAP emissions exceeded the maximum allowable annual facility-wide individual HAP emission rate of 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions.
4. The permittee shall submit deviation (excursion) reports identifying each calendar month of the first 12 calendar months of operation, after the issuance of this permit, during which the cumulative of monthly facility-wide total combined HAP emissions exceeded the maximum allowable cumulative of monthly facility-wide emissions of total combined HAP.
5. The permittee shall submit deviation (excursion) reports identifying each rolling, 12-month year, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide total combined HAP emissions exceeded the maximum allowable annual facility-wide total combined HAP emission rate of 14.6 TPY, based upon a rolling, 12-month summation of the monthly emissions.
6. The permittee shall submit deviation (excursion) reports which identify each calendar month during which the average hourly facility-wide toluene emissions exceeded the maximum allowable facility-wide toluene emission rate of 13.7 lbs/hr.
7. The deviation reports shall be submitted in accordance with the requirements specified in Part 1 - General Term and Condition 3.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
Formulation data or USEPA Methods 24/24A shall be used to determine the organic material and HAP contents of the adhesive/paint strippers, prepping materials, tackifying materials, adhesives, trim cements, and cleanup materials.

Emission Limitations:

8 lbs/hr of organic material
40 lbs/day of organic material

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitations based upon the record keeping requirements of Section C.1.

Emission Limitation:

13.7 lbs/hr toluene

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements of Section C.4.

Emission Limitation:

Maximum allowable cumulative of monthly facility-wide individual HAP emissions for the first 12 calendar months of operation following the issuance of this permit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements of Section C.2.

Emission Limitation:

Maximum allowable annual facility-wide individual HAP emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements of Section C.2.

Emission Limitation:

Maximum allowable cumulative of monthly facility-wide total combined HAP emissions for the first 12 calendar months of operation following the issuance of this permit

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements of Section C.3.

Emission Limitation:

Maximum allowable annual facility-wide total combined HAP emissions after the first 12 calendar months of operation following the issuance of this permit shall not exceed 14.6 TPY, based upon a rolling, 12-month

summation of the monthly emissions

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements of Section C.3.

F. Miscellaneous Requirements

1. The permittee is hereby notified that this permit and all agency records concerning this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
2. The permittee shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of this emissions unit.
3. This permit allows the use of the organic materials specified by the permittee in the application for PTI 16-1647. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the facility-wide toluene emission limitation specified in the table below was derived in accordance with the Ohio EPA's "Air Toxics Policy" ("A.T.P."), based on the toluene usage rate, formulation data, and the volume source parameters of the facility building (there are no stacks as egress points for the emissions units), as specified in the permit application. Compliance with the Ohio EPA's "A.T.P." was demonstrated for toluene based on the Screen3 model and a comparison of 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 facility-wide emissions of toluene:

Pollutant: toluene (CAS 108-88-3)

TWA (ug/m3): 188,000

Facility-wide Maximum Allowable Average Hourly Emission Rate (lbs/hr): 13.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4460

MAGLC (ug/m3): 4476

4. Any of the following changes may be deemed a "modification" to the emissions unit(s) and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI 16-1647 and the operating permit:
 - any changes in the composition of the adhesive/paint strippers, prepping, tackifying, or cleanup materials, adhesives, or trim cements, or the use of new adhesive/paint strippers, prepping, tackifying, or cleanup materials, adhesives, or trim cements, that would result in the emission of a compound with a lower Time-Weighted Average (TWA) threshold level, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TWA value specified in the above table;
 - any change in the emission rate(s) of the emissions unit(s) or the volume source parameters of the facility building that would result in an exceedance of any MAGLC specified in the above table;
 - any change to any emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
 - any change in the composition of the adhesive/paint strippers, prepping, tackifying, or cleanup materials, adhesives, or trim cements, or use of new adhesive/paint strippers, prepping, tackifying, or cleanup materials, adhesives, or trim cements, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
 - any change in the composition of the adhesive/paint strippers, prepping, tackifying, or cleanup materials, adhesives, or trim cements, or the use of new adhesive/paint strippers, prepping, tackifying, or cleanup materials, adhesives, or trim cements, that would result in additional and/or increased emissions of any HAP as defined in OAC rule 3745-77-01(V).