

Facility ID: 1677010195 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.

[Go to Part II for Emissions Unit P015](#)

[Go to Part II for Emissions Unit P029](#)

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Facility ID: 1677010195 Emissions Unit ID: P015 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
Polymerization reactors to create a latex resin product(s) and intermediates	OAC rule 3745-17-07	See A.2.a, A.2.b, and A.2.c below.
	OAC rule 3745-17-11	0.551 lbs/hr of particulates (based on 100 lbs/hr maximum process weight of peroxides) See A.2.d below.
	OAC rule 3745-31-05 (PTI 16-494)	See A.2.e below.
	OAC rule 3745-21-07(G)(2)	See A.2.f below.

2. Additional Terms and Conditions

- (a) Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

No monitoring, record keeping, or reporting is necessary to demonstrate ongoing compliance with the visible particulate emissions limitation in section A.2.a because the potential to emit for this emissions unit is less than 5 pounds per month and the emissions unit is controlled with a filter system which is adequate to prevent deviations of the visible particulate emissions limitation.

The permittee shall operate and maintain the filter system in accordance with the manufacturer's recommendations, instructions, and operating manual(s), and any modifications deemed necessary by the permittee.

Maximum process weight rate for this emissions unit was developed based upon the current product mix. If heavier dry materials are handled in this emissions unit, the permittee shall notify the Akron RAQMD in writing.

Emissions shall be limited to 7 lbs/hr of organic compounds (OC).
Emissions shall be limited to 40 lbs/day of OC, unless reduced by 85% .

B. Operational Restrictions

1. An electric igniter shall be maintained at the flare discharge whenever this unit is in operation and employing organic compounds.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain a device to continuously monitor the presence of an electric igniter arc when the emissions unit is in operation and employing organic compounds. The monitoring device and any recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, and any modifications deemed necessary by the permittee.
2. The permittee shall record the following information each day:
 - all periods during which the emissions unit was in operation and employing organic compounds and the electric igniter was not functioning properly;
 - all periods during which the emissions unit was in operation and employing organic compounds and the monitoring device was out of service; and

the total number of hours the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
An identification of each day during which the average hourly controlled organic compound emissions from the resins and cleanup materials exceeded 7 pounds per hour, and the actual average hourly controlled organic compound emissions for each such day.
An identification of each day during which the controlled organic compound emissions from the resins and cleanup materials exceeded 40 pounds per day, and the actual controlled organic compound emissions for each such day.
All periods during which the emissions unit was in operation and employing organic compounds and the electric igniter was not functioning properly. The reports shall include the date, time, and duration of each such period.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with paragraph (3) of the General Terms and Conditions.
3. The permittee shall submit annual reports which identify the following:
the total actual emissions of organic compounds from the flare.
4. The reports shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in A.1 and A.2 above shall be determined in accordance with the following methods:
Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures and method(s) in OAC rule 3745-17-03(B)(1).
Emission Limitation:

5.51 lbs/hr of particulates, except as adjusted per section A.1.2.d above

Applicable Compliance Method:

If required, compliance with this mass emission limitation shall be demonstrated in accordance with the procedures and test methods specified in OAC rule 3745-17-03(B).
Emission Limitation:

7 lbs/hr of OC and 40 lbs/day of OC, unless 85% reduction

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements in C.1 and C.2 above.

F. Miscellaneous Requirements

1. None

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Facility ID: 1677010195 Emissions Unit ID: P029 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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</u>
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		<u>Measures</u>
Resin manufacturing process (including coagulator, dewatering devices, extruder dryer, pelletizer, pelletizer dryer and bagger), controlled with fabric filters	OAC rule 3745-31-05 (PTI 16-1350)	See A.2.a. through A.2.f below.
	OAC rule 3745-17-07	See A.2.g below.
	OAC rule 3745-17-08	See A.2.h below.
	OAC rule 3745-17-11	See A.2.i below.
	OAC rule 3745-21-07(G)(9)(c)	exempt See A.2.j below.

2. Additional Terms and Conditions

- (a) Particulate matter (PM) emissions shall not exceed 1.0 pound per hour, nor 4.38 tons per year. Total Volatile Organic Compound and/or Organic Material (VOC and/or OC, including specific compounds) emissions shall not exceed 4.0 pounds per hour, nor 17.52 tons per year. Methylbutyrate emissions shall not exceed 1.64 pounds per hour, nor 7.18 tons per year. Butylacetate emissions shall not exceed 0.62 pound per hour, nor 2.72 tons per year. Cumene emissions shall not exceed 0.45 pound per hour, nor 1.97 tons per year. Xylene emissions shall not exceed 0.37 pound per hour, nor 1.62 tons per year. Visible particulate emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average. The permittee shall employ the following reasonably available control measures to minimize or eliminate visible particulate emissions of fugitive dust:
 - i. the employment of two fabric filters (baghouses), in accordance with the manufacturer's recommendations, instructions, and operating manual(s), to adequately control particulate emissions from the pellet dryer and grinder airveyor operations (the two baghouses corresponding to the above operations are identified respectively as the pellet baghouse and filter receiver baghouse);
 - ii. the employment of hoods, ducts, fans, and other equipment, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), to adequately enclose, contain, capture, and vent particulate matter to each of the two baghouses; and
 - iii. the collection efficiency of the capture equipment (associated with the baghouse) shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design. The emissions limit based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05. This emissions unit is exempt from an organic compound emission rate provided it meets the following exemption conditions:
 - i. the volatile content of the material employed consists only of water and liquid organic material;
 - ii. the liquid organic material comprises not more than twenty per cent of said volatile content; and
 - iii. the volatile content is not a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

- 1. The permittee shall not operate this emissions unit if a failure with the baghouse is detected by the solids flow detector (described below).

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly install, operate, and maintain a solids flow detector to monitor the effectiveness (clean air side) of the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

The solids flow detector upon monitoring a failure with the baghouse (i.e., particulates passing through the clean air side of the baghouse in quantities exceeding normal solids flow, as established through calibration of the monitoring equipment, in accordance with the manufacturer's recommendations, instructions, and operating manual(s)) shall either alert the operator of the emissions unit or cause the emissions unit to stop operating in order to correct the baghouse failure. The permittee shall record any failures of the baghouse, as monitored by the solids flow detector, on a daily basis.

The permittee shall calibrate and record the testing of the solids flow detector, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), on a monthly basis.

- 2. The permittee shall collect and record the following information each month:
 - a. whether or not the volatile content of each material employed consists of only water and liquid organic material;
 - b. the percent, by volume, of liquid organic material contained in the volatile content of each material employed; and
 - c. whether or not the volatile content of each material employed is a photochemically reactive material.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which a failure, as monitored by the solids flow detector, occurred with the baghouse.
- 2. The permittee shall submit deviation (excursion) reports that identify any materials employed which do not meet

the exemption requirements as detailed in section A.2.j of this permit.

3. The deviation reports shall be submitted in accordance with the requirements of Part I - General Term and Condition 3 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

1.0 pound/hour and 4.38 tons/year of particulate matter

Applicable Compliance Method:

Based on data supplied with the application submitted on November 19, 1993 for PTI 16-1350, the total hourly emission rate (pounds/hour) is the sum of the products of the known controlled pollutant emission rate for each baghouse (in grains per standard cubic feet per minute), multiplied by the exit gas volume of each (in standard cubic feet per minute), multiplied by the conversion factor of 60 minutes per hour, multiplied by the conversion factor of 1 pound per 7000 grains. The sum of the hourly emission rates of both baghouses is then rounded up to yield an hourly emissions rate limitation of 1.0 pound/hour.

For the pellet baghouse, the exit gas volume of 4800 ACFM is converted to 3900 SCFM. For the filter receiver baghouse, the exit gas volume of 700 ACFM is converted to 570 SCFM. Both baghouses have a known controlled emission rate of 0.02 grains per SCFM.

The 4.38 tons/year emissions limitation was developed by multiplying the 1.0 pound/hour emissions limitation by a maximum annual operating schedule of 8760 hours/year. Therefore, compliance limitation shall be based upon the number of operating hours times the 1.0 pound/hour limitation, divided by 2,000 pounds/ton.
Emission Limitation:

4.0 pounds/hour and 17.52 tons/year of total volatile organic compound and/or organic material (including specific compounds)

Applicable Compliance Method:

Based on data supplied with the application resubmitted on January 31, 1995 for the administrative modification of PTI 16-1350, the total process VOC emissions calculated as "maximum case" in table 2 is 16.91 tons/year. The hourly emission rate (pounds/hour) was developed by dividing the maximum case emission rate by product of the total run days listed in table 2 (365 days) by the normal operating schedule of 24 hours/day, and multiplying by the conversion factor of 2000 pounds/ton. This hourly emission rate is then rounded up to yield an hourly emissions rate limitation of 4.0 pounds/hour.

The 17.52 tons/year emissions limitation was developed by multiplying the 4.0 pounds/hour emissions limitation by a maximum annual operating schedule of 8760 hours/year. Therefore, compliance limitation shall be based upon the number of operating hours times the 4.0 pounds/hour limitation, divided by 2,000 pounds/ton.
Emission Limitation:

1.64 pounds/hour and 7.18 tons/year of methylbutyrate

Applicable Compliance Method:

Based on data supplied with the application resubmitted on January 31, 1995 for the administrative modification of PTI 16-1350, the total process methylbutyrate emissions calculated as "maximum case" in table 2 is 7.166 tons/year. The hourly emission rate (pounds/hour) was developed by dividing the maximum case emission rate by product of the total run days listed in table 2 (365 days) by the normal operating schedule of 24 hours/day, and multiplying by the conversion factor of 2000 pounds/ton. This hourly emission rate is then rounded up to yield an hourly emissions rate limitation of 1.64 pounds/hour.

The 7.18 tons/year emissions limitation was developed by multiplying the 1.64 pounds/hour emissions limitation by a maximum annual operating schedule of 8760 hours/year. Therefore, compliance limitation shall be based upon the number of operating hours times the 4.0 pounds/hour limitation, divided by 2,000 pounds/ton.
Emission Limitation:

0.62 pound/hour and 2.72 tons/year of butylacetate

Applicable Compliance Method:

Based on data supplied with the application resubmitted on January 31, 1995 for the administrative modification of PTI 16-1350, the total process butylacetate emissions calculated as "maximum case" in table 2 is 2.711 tons/year. The hourly emission rate (pounds/hour) was developed by dividing the maximum case emission rate by product of the total run days listed in table 2 (365 days) by the normal operating schedule of 24 hours/day, and multiplying by the conversion factor of 2000 pounds/ton. This hourly emission rate is then rounded up to yield an hourly emissions rate limitation of 0.62 pound/hour.

The 2.72 tons/year emissions limitation was developed by multiplying the 0.62 pound/hour emissions limitation by a maximum annual operating schedule of 8760 hours/year. Therefore, compliance limitation shall be based upon the number of operating hours times the 4.0 pounds/hour limitation, divided by 2,000 pounds/ton.
Emission Limitation:

0.45 pound/hour and 1.97 tons/year of cumene

Applicable Compliance Method:

Based on data supplied with the application resubmitted on January 31, 1995 for the administrative modification of PTI 16-1350, the total process cumene emissions calculated as "maximum case" in table 2 is 1.953 tons/year. The hourly emission rate (pounds/hour) was developed by dividing the maximum case emission rate

by product of the total run days listed in table 2 (365 days) by the normal operating schedule of 24 hours/day, and multiplying by the conversion factor of 2000 pounds/ton. This hourly emission rate is then rounded up to yield an hourly emissions rate limitation of 0.45 pound/hour.

The 1.97 tons/year emissions limitation was developed by multiplying the 0.45 pound/hour emissions limitation by a maximum annual operating schedule of 8760 hours/year. Therefore, compliance limitation shall be based upon the number of operating hours times the 4.0 pounds/hour limitation, divided by 2,000 pounds/ton.
Emission Limitation:

0.37 pound/hour and 1.62 tons/year of xylene

Applicable Compliance Method:

Based on data supplied with the application resubmitted on January 31, 1995 for the administrative modification of PTI 16-1350, the total process xylene emissions calculated as "maximum case" in table 2 is 1.621 tons/year. The hourly emission rate (pounds/hour) was developed by dividing the maximum case emission rate by product of the total run days listed in table 2 (365 days) by the normal operating schedule of 24 hours/day, and multiplying by the conversion factor of 2000 pounds/ton. This hourly emission rate is then rounded to yield an hourly emissions rate limitation of 0.37 pound/hour.

The 1.62 tons/year emissions limitation was developed by multiplying the 0.37 pound/hour emissions limitation by a maximum annual operating schedule of 8760 hours/year. Therefore, compliance limitation shall be based upon the number of operating hours times the 4.0 pounds/hour limitation, divided by 2,000 pounds/ton.
Emissions Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3)
Emission Limitation:

no visible particulate emissions

Applicable Compliance Method:

Method 22, 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. 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 the sources.
2. The permittee is hereby notified that this permit and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.