

Facility ID: 1677010204 Issuance type: Draft 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 P017](#)  
[Go to Part II for Emissions Unit P018](#)  
[Go to Part II for Emissions Unit P019](#)  
[Go to Part II for Emissions Unit P020](#)  
[Go to Part II for Emissions Unit P021](#)  
[Go to Part II for Emissions Unit P022](#)  
[Go to Part II for Emissions Unit P023](#)  
[Go to Part II for Emissions Unit P025](#)  
[Go to Part II for Emissions Unit P026](#)  
[Go to Part II for Emissions Unit P027](#)  
[Go to Part II for Emissions Unit P028](#)  
[Go to Part II for Emissions Unit P029](#)  
[Go to Part II for Emissions Unit P030](#)  
[Go to Part II for Emissions Unit P031](#)  
[Go to Part II for Emissions Unit P032](#)  
[Go to Part II for Emissions Unit P033](#)  
[Go to Part II for Emissions Unit P034](#)  
[Go to Part II for Emissions Unit P035](#)  
[Go to Part II for Emissions Unit P036](#)  
[Go to Part II for Emissions Unit P037](#)

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Facility ID: 1677010204 Emissions Unit ID: P017 Issuance type: Draft 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>
P017 - Sealant Mixer COAT 02 Uncontrolled. No PTI, pre 1974.	OAC rule 3745-35-07(B)(2)	See A.2.a below

#### 2. Additional Terms and Conditions

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

#### B. Operational Restrictions

1. Volatile organic compound emissions (VOC) shall not exceed 1.036 pounds per hour, nor 4.54 tons per year.  
  
The hourly and annual VOC emission limitations were established based on the potential to emit for this emissions unit to demonstrate compliance with the facility-wide synthetic minor strategy. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.
2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00152 pound VOC per hour per pound of ingredients.

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

1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
2. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit; and
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions.
3. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
  - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c of this permit.

**E. Testing Requirements**

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

9.99 tons per year of any individual HAP facility-wide  
24.9 tons per year of all HAPs facility-wide  
99.9 tons per year of VOC facility-wide

Applicable Compliance Method:

Compliance will be demonstrated through record keeping established in section C of this permit.

Operational Restriction:

Volatile organic compound emissions (VOC) shall not exceed 0.00152 pound VOC per hour per pound of ingredients

Applicable Compliance Method:

The operational restriction was requested by the permittee through their consultant RMT, Inc. Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Operational Restriction:

Volatile organic compound emissions (VOC) shall not exceed 1.036 pounds per hour.

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the VOC emissions factor of 0.00152 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer. The emission calculation where supplied by the permittee through their consultant RMT, Inc, based on stack testing conducted at the facility.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.

\*Emission factor, was derived from stack testing performed at the facility on August 9, 2000 and August 10, 2000.

Voluntary Emission Limitation:

4.54 tons of VOC per year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

**F. Miscellaneous Requirements**

- 1. None

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Facility ID: 1677010204 Emissions Unit ID: P018 Issuance type: Draft 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>
P018 - Sealant Mixer Coat-04 - Sealant Mixer, Uncontrolled.	OAC rule 3745-31-05(A)(3) PTI # 16-2179 issued 04/04/2002, and modified 10/19/2006. OAC rule 3745-35-07(B)(2)	Volatile organic compound emissions (VOC) shall not exceed 0.92 pounds per hour VOC, nor 4.02 tons per year. See A.2.a below

- 2. **Additional Terms and Conditions**
  - (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

- 1. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00218 pound VOC per hour per pound of ingredients.

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

- 1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
- 2. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit; and
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
  - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c of this permit.
3. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

**E. Testing Requirements**

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

Emission Limitation:

9.99 tons per year of any individual HAP facility-wide  
 24.9 tons per year of all HAPs facility-wide  
 99.9 tons per year of VOC facility-wide

Applicable Compliance Method:

Compliance will be demonstrated through record keeping established in section C of this permit.

Operational Restriction:

Volatile organic compound emissions (VOC) shall not exceed 0.00218 pound VOC per hour per pound of ingredients

Applicable Compliance Method:

Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Emission Limitation:

Volatile organic compound emissions (VOC) shall not exceed 0.92 pounds per hour VOC, nor 4.02 tons per year.

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the uncontrolled VOC emissions factor of 0.00218 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer and by [1 minus the estimated control efficiency of 84%].

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

\* the overall control efficiency of the condenser is approximately 84% (90% capture and 93% control), Emission factor, and estimated control factor were derived from stack testing performed at the facility on August 9 -10, 2000.

**F. Miscellaneous Requirements**

1. None

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Facility ID: 1677010204 Emissions Unit ID: P019 Issuance type: Draft 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>
P019 - Sealant Mixer COAT 07 Uncontrolled. No PTI, pre 1974.	OAC rule 3745-35-07(B)(2)	See A.2.a below

**2. Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

1. Volatile organic compound emissions (VOC) shall not exceed 1.298 pounds per hour, nor 5.69 tons per year.
 

The hourly and annual VOC emission limitations were established based on the potential to emit for this emissions unit to demonstrate compliance with the facility-wide synthetic minor strategy. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.
2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00273 pound VOC per hour per pound of ingredients.

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

1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
2. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit; and
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
  - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.
3. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of

each year; and each report shall cover the previous calendar quarter.

**E. Testing Requirements**

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

9.99 tons per year of any individual HAP facility-wide  
24.9 tons per year of all HAPs facility-wide  
99.9 tons per year of VOC facility-wide

Applicable Compliance Method:

Compliance will be demonstrated through record keeping established in section C of this permit.  
Operational Restriction:

Volatile organic compound emissions (VOC) shall not exceed 0.00273 pound VOC per hour per pound of ingredients

Applicable Compliance Method:

Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.  
Operational Restriction:

Volatile organic compound emissions (VOC) shall not exceed 1.298 pounds per hour.

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the VOC emissions factor of 0.00273 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.

\*Emission factor, was derived from stack testing performed at the facility on August 9, 2000 and August 10, 2000.

Voluntary Emission Limitation:

5.69 tons of VOC per year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

**F. Miscellaneous Requirements**

1. None

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Facility ID: 1677010204 Emissions Unit ID: P020 Issuance type: Draft 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>
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Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Operational Restriction:

Volatile organic compound emissions (VOC) shall not exceed 1.298 pounds per hour.

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the VOC emissions factor of 0.00273 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.

\*Emission factor, was derived from stack testing performed at the facility on August 9, 2000 and August 10, 2000.

Voluntary Emission Limitation:

5.69 tons of VOC per year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

**F. Miscellaneous Requirements**

- 1. None

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Facility ID: 1677010204 Emissions Unit ID: P021 Issuance type: Draft 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>
P021 - Sealant Mixer COAT 09 Uncontrolled. No PTI, pre 1974.	OAC rule 3745-35-07(B)(2)	See A.2.a below

**2. Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

- 1. Volatile organic compound emissions (VOC) shall not exceed 1.298 pounds per hour, nor 5.69 tons per year.
 

The hourly and annual VOC emission limitations were established based on the potential to emit for this emissions unit to demonstrate compliance with the facility-wide synthetic minor strategy. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.

2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00273 pound VOC per hour per pound of ingredients.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
- the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - the total weight of the batch production, in pounds;
  - the number of hours the mixer was in operation.
2. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
- the calculated monthly emissions;
  - the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit; and
  - the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions.
- D. Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which include the following information:
- an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
2. The permittee shall submit deviation (excursion) reports which include the following information:
- an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
  - an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.
3. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.
- E. Testing Requirements**
1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:
- Emission Limitation:
- 9.99 tons per year of any individual HAP facility-wide  
 24.9 tons per year of all HAPs facility-wide  
 99.9 tons per year of VOC facility-wide
- Applicable Compliance Method:
- Compliance will be demonstrated through record keeping established in section C of this permit.
- Operational Restriction:
- Volatile organic compound emissions (VOC) shall not exceed 0.00273 pound VOC per hour per pound of ingredients
- Applicable Compliance Method:
- Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.
- Operational Restriction:
- Volatile organic compound emissions (VOC) shall not exceed 1.298 pounds per hour.
- Applicable Compliance Method:
- The hourly allowable VOC emission limitation was established by multiplying the VOC emissions factor of 0.00273 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer.
- If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.
- \*Emission factor, was derived from stack testing performed at the facility on August 9, 2000 and August 10, 2000.
- Voluntary Emission Limitation:

5.69 tons of VOC per year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

**F. Miscellaneous Requirements**

- 1. None

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Facility ID: 1677010204 Emissions Unit ID: P022 Issuance type: Draft 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>
P022 - Sealant Mixer COAT 10 Uncontrolled. No PTI, pre 1974.	OAC rule 3745-35-07(B)(2)	See A.2.a below

**2. Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

- 1. Volatile organic compound emissions (VOC) shall not exceed 1.298 pounds per hour, nor 5.69 tons per year.
 

The hourly and annual VOC emission limitations were established based on the potential to emit for this emissions unit to demonstrate compliance with the facility-wide synthetic minor strategy. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.
- 2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00273 pound VOC per hour per pound of ingredients.

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

- 1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
- 2. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;

- b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit; and
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions.
- D. Reporting Requirements**
- 1. The permittee shall submit deviation (excursion) reports which include the following information:
    - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
  - 2. The permittee shall submit deviation (excursion) reports which include the following information:
    - a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
    - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
    - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.
  - 3. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.
- E. Testing Requirements**
- 1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
9.99 tons per year of any individual HAP facility-wide  
24.9 tons per year of all HAPs facility-wide  
99.9 tons per year of VOC facility-wide  
  
Applicable Compliance Method:  
  
Compliance will be demonstrated through record keeping established in section C of this permit.  
Operational Restriction:  
  
Volatile organic compound emissions (VOC) shall not exceed 0.00273 pound VOC per hour per pound of ingredients  
  
Applicable Compliance Method:  
  
Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.  
Operational Restriction:  
  
Volatile organic compound emissions (VOC) shall not exceed 1.298 pounds per hour.  
  
Applicable Compliance Method:  
The hourly allowable VOC emission limitation was established by multiplying the VOC emissions factor of 0.00273 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer.  
  
If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.  
  
\*Emission factor, was derived from stack testing performed at the facility on August 9, 2000 and August 10, 2000.  
Voluntary Emission Limitation:  
  
5.69 tons of VOC per year  
  
Applicable Compliance Method:  
  
As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).
- F. Miscellaneous Requirements**
- 1. None

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Facility ID: 1677010204 Emissions Unit ID: P023 Issuance type: Draft 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>
P023 - Sealant Mixer COAT 11 Uncontrolled. No PTI, pre 1974.	OAC rule 3745-35-07(B)(2)	See A.2.a below

**2. Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

1. Volatile organic compound emissions (VOC) shall not exceed 1.298 pounds per hour, nor 5.69 tons per year.  
  
The hourly and annual VOC emission limitations were established based on the potential to emit for this emissions unit to demonstrate compliance with the facility-wide synthetic minor strategy. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.
2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00273 pound VOC per hour per pound of ingredients.

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

1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
2. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit; and
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the

period.

- c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.
  - 3. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.
- E. Testing Requirements**

- 1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
9.99 tons per year of any individual HAP facility-wide  
24.9 tons per year of all HAPs facility-wide  
99.9 tons per year of VOC facility-wide  
  
Applicable Compliance Method:  
  
Compliance will be demonstrated through record keeping established in section C of this permit.  
Operational Restriction:  
  
Volatile organic compound emissions (VOC) shall not exceed 0.00273 pound VOC per hour per pound of ingredients  
  
Applicable Compliance Method:  
  
Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.  
Operational Restriction:  
  
Volatile organic compound emissions (VOC) shall not exceed 1.298 pounds per hour.  
  
Applicable Compliance Method:  
The hourly allowable VOC emission limitation was established by multiplying the VOC emissions factor of 0.00273 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer.  
  
If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.  
  
\*Emission factor, was derived from stack testing performed at the facility on August 9, 2000 and August 10, 2000.  
Voluntary Emission Limitation:  
  
5.69 tons of VOC per year  
  
Applicable Compliance Method:  
  
As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).
- F. Miscellaneous Requirements**
- 1. None

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Facility ID: 1677010204 Emissions Unit ID: P025 Issuance type: Draft 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>
P025 - Sealant Mixer coat 13 Sealant Mixer, controlled by a water cooled condenser.	OAC rule 3745-31-05(A)(3) PTI # 16-2179 issued 04/04/2002, and modified 10/19/2006. OAC rule 3745-35-07(B)(2)	Volatile organic compound emissions (VOC) shall not exceed 0.36 pounds per hour VOC, nor 1.56 tons per year. See A.2.a below

**2. Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

- 1. The permittee shall operate the condenser at all times whenever this emissions unit is in operation.
- 2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00127 pound VOC per hour per pound of ingredients.

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

- 1. The permittee shall operate and maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation and mixing a solvent containing material. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

Whenever the monitored value for the cooling temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the cooling temperature within the condenser immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature of the cooling water from the chiller, before entering the condenser, shall not be greater than 55 degrees Fahrenheit, when the emissions unit is in operation and mixing a solvent containing material.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

- 2. The permittee shall maintain daily records that document any time periods when the condenser was not in service when the emissions unit was in operation.
- 3. The permittee shall record the cooling water temperature on a once per shift basis.
- 4. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
- 5. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emisisions from this emissions unit; and
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions.

**D. Reporting Requirements**

- 1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

- a. all periods of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the cooling temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
  - e. an identification of each incident where the emissions unit was in operation when the condenser was not operating.
2. The permittee shall submit deviation (excursion) reports which include the following information:
    - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
  3. The permittee shall submit deviation (excursion) reports which include the following information:
    - a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
    - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
    - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.
  4. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.
- E. Testing Requirements**
1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation:  
9.99 tons per year of any individual HAP facility-wide  
24.9 tons per year of all HAPs facility-wide  
99.9 tons per year of VOC facility-wide  
  
Applicable Compliance Method:  
  
Compliance will be demonstrated through record keeping established in section C of this permit.  
Operational Restriction:  
  
Volatile organic compound emissions (VOC) shall not exceed 0.00127 pound VOC per hour per pound of ingredients  
  
Applicable Compliance Method:  
  
Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.  
Emission Limitation:  
  
Volatile organic compound emissions (VOC) shall not exceed 0.36 pounds per hour VOC, nor 1.56 tons per year.  
  
Applicable Compliance Method:  
  
The hourly allowable VOC emission limitation was established by multiplying the uncontrolled VOC emissions factor of 0.00143 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer and by [1 minus the estimated control efficiency of 84%].  
  
If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.  
  
As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).  
  
\* the overall control efficiency of the condenser is approximately 84% (90% capture and 93% control), Emission factor, and estimated control factor were derived from stack testing performed at the facility on August 9 -10, 2000.

**F. Miscellaneous Requirements**

1. None

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Facility ID: 1677010204 Emissions Unit ID: P026 Issuance type: Draft 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>
P026 - Sealant Mixer COAT 14 Uncontrolled. No PTI, pre 1974.	OAC rule 3745-35-07(B)(2)	See A.2.a below

**2. Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

1. Volatile organic compound emissions (VOC) shall not exceed 0.937 pounds per hour, nor 4.1 tons per year.  
  
The hourly and annual VOC emission limitations were established based on the potential to emit for this emissions unit to demonstrate compliance with the facility-wide synthetic minor strategy. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.
2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00152 pound VOC per hour per pound of ingredients.

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

1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
2. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit; and
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions.

**D. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. all periods of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the cooling temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
  - e. an identification of each incident where the emissions unit was in operation when the condenser was not operating.
2. The permittee shall submit deviation (excursion) reports which include the following information:
- a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
3. The permittee shall submit deviation (excursion) reports which include the following information:
- a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
  - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.
4. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.
- E. Testing Requirements**
1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:
- 9.99 tons per year of any individual HAP facility-wide  
24.9 tons per year of all HAPs facility-wide  
99.9 tons per year of VOC facility-wide
- Applicable Compliance Method:
- Compliance will be demonstrated through record keeping established in section C of this permit.  
Operational Restriction:
- Volatile organic compound emissions (VOC) shall not exceed 0.00155 pound VOC per hour per pound of ingredients
- Applicable Compliance Method:
- Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.  
Operational Restriction:
- Volatile organic compound emissions (VOC) shall not exceed 0.937 pounds per hour.
- Applicable Compliance Method:  
The hourly allowable VOC emission limitation was established by multiplying the VOC emissions factor of 0.00155 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer.
- If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.
- \*Emission factor, was derived from stack testing performed at the facility on August 9, 2000 and August 10, 2000.  
Voluntary Emission Limitation:
- 4.1 tons of VOC per year
- Applicable Compliance Method:
- As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).
- F. Miscellaneous Requirements**
1. None

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

Facility ID: 1677010204 Emissions Unit ID: P027 Issuance type: Draft 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>
P027 - Sealant Mixer COAT 15 Uncontrolled. No PTI, pre 1974.	OAC rule 3745-35-07(B)(2)	See A.2.a below

**2. Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

1. Volatile organic compound emissions (VOC) shall not exceed 0.995 pounds per hour, nor 4.36 tons per year.
 

The hourly and annual VOC emission limitations were established based on the potential to emit for this emissions unit to demonstrate compliance with the facility-wide synthetic minor strategy. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limit.
2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00157 pound VOC per hour per pound of ingredients.

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

1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
2. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit; and
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
2. The permittee shall submit deviation (excursion) reports which include the following information:

- a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
  - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.
3. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.
- E. Testing Requirements**

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

9.99 tons per year of any individual HAP facility-wide  
24.9 tons per year of all HAPs facility-wide  
99.9 tons per year of VOC facility-wide

Applicable Compliance Method:

Compliance will be demonstrated through record keeping established in section C of this permit.  
Operational Restriction:

Volatile organic compound emissions (VOC) shall not exceed 0.00157 pound VOC per hour per pound of ingredients

Applicable Compliance Method:

Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.  
Operational Restriction:

Volatile organic compound emissions (VOC) shall not exceed 0.995 pounds per hour.

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the VOC emissions factor of 0.00157 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.

\*Emission factor, was derived from stack testing performed at the facility on August 9, 2000 and August 10, 2000.

Voluntary Emission Limitation:

4.36 tons of VOC per year

Applicable Compliance Method:

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

**F. Miscellaneous Requirements**

1. None

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

**Facility ID: 1677010204 Emissions Unit ID: P028 Issuance type: Draft 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>
P028 - Sealant Mixer coat 16 Sealant Mixer, controlled by a water cooled condenser.	OAC rule 3745-31-05(A)(3) PTI # 16-2179 issued 04/04/2002, and modified 10/19/2006. OAC rule 3745-35-07(B)(2)	Volatile organic compound emissions (VOC) shall not exceed 0.75 pounds per hour VOC, nor 3.28 tons per year. See A.2.a below

- 2. **Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

- 1. The permittee shall operate the condenser at all times whenever this emissions unit is in operation.
- 2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00143 pound VOC per hour per pound of ingredients.

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

- 1. The permittee shall operate and maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation and mixing a solvent containing material. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

Whenever the monitored value for the cooling temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the cooling temperature within the condenser immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature of the cooling water from the chiller, before entering the condenser, shall not be greater than 55 degrees Fahrenheit, when the emissions unit is in operation and mixing a solvent containing material.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

- 2. The permittee shall maintain daily records that document any time periods when the condenser was not in service when the emissions unit was in operation.
- 3. The permittee shall record the cooling water temperature on a once per shift basis.
- 4. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
- 5. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit; and
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs

emissions.

**D. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. all periods of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the cooling temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
  - e. an identification of each incident where the emissions unit was in operation when the condenser was not operating.
2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
3. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
  - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c of this permit.
4. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

**E. Testing Requirements**

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

Emission Limitation:

9.99 tons per year of any individual HAP facility-wide  
 24.9 tons per year of all HAPs facility-wide  
 99.9 tons per year of VOC facility-wide

Applicable Compliance Method:

Compliance will be demonstrated through record keeping established in section C of this permit.

Operational Restriction:

Volatile organic compound emissions (VOC) shall not exceed 0.00143 pound VOC per hour per pound of ingredients

Applicable Compliance Method:

Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Emission Limitation:

Volatile organic compound emissions (VOC) shall not exceed 0.75 pounds per hour VOC, nor 3.28 tons per year.

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the uncontrolled VOC emissions factor of 0.00143 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer and by [1 minus the estimated control efficiency of 84%].

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

\* the overall control efficiency of the condenser is approximately 84% (90% capture and 93% control), Emission

factor, and estimated control factor were derived from stack testing performed at the facility on August 9 -10, 2000.

**F. Miscellaneous Requirements**

- 1. None

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

**Facility ID: 1677010204 Emissions Unit ID: P029 Issuance type: Draft 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>
P029 - Sealant Mixer coat 17 Sealant Mixer, controlled by a water cooled condenser.	OAC rule 3745-31-05(A)(3) PTI # 16-2179 issued 04/04/2002, and modified 10/19/2006. OAC rule 3745-35-07(B)(2)	Volatile organic compound emissions (VOC) shall not exceed 0.21 pounds per hour VOC, nor 0.93 tons per year. See A.2.a below

- 2. **Additional Terms and Conditions**
  - (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

- 1. The permittee shall operate the condenser at all times whenever this emissions unit is in operation.
- 2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00102 pound VOC per hour per pound of ingredients.

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

- 1. The permittee shall operate and maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation and mixing a solvent containing material. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

Whenever the monitored value for the cooling temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the cooling temperature within the condenser immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature of the cooling water from the chiller, before entering the condenser, shall not be greater than

55 degrees Fahrenheit, when the emissions unit is in operation and mixing a solvent containing material.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall maintain daily records that document any time periods when the condenser was not in service when the emissions unit was in operation.
3. The permittee shall record the cooling water temperature on a once per shift basis.
4. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
5. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit; and
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions.

**D. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. all periods of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the cooling temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
  - e. an identification of each incident where the emissions unit was in operation when the condenser was not operating.
2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
3. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
  - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c of this permit.
4. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation:  
 9.99 tons per year of any individual HAP facility-wide  
 24.9 tons per year of all HAPs facility-wide  
 99.9 tons per year of VOC facility-wide  
  
 Applicable Compliance Method:

Compliance will be demonstrated through record keeping established in section C of this permit.

Operational Restriction:

Volatile organic compound emissions (VOC) shall not exceed 0.00102 pound VOC per hour per pound of ingredients

Applicable Compliance Method:

Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Emission Limitation:

Volatile organic compound emissions (VOC) shall not exceed 0.21 pounds per hour VOC, nor 0.93 tons per year.

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the uncontrolled VOC emissions factor of 0.00102 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer and by [1 minus the estimated control efficiency of 84%].

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

\* the overall control efficiency of the condenser is approximately 84% (90% capture and 93% control), Emission factor, and estimated control factor were derived from stack testing performed at the facility on August 9 -10, 2000.

**F. Miscellaneous Requirements**

- 1. None

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

Facility ID: 1677010204 Emissions Unit ID: P030 Issuance type: Draft 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>
P030 - Sealant Mixer coat 18 Sealant Mixer, controlled by a water cooled condenser.	OAC rule 3745-31-05(A)(3) PTI # 16-2179 issued 04/04/2002, and modified 10/19/2006. OAC rule 3745-35-07(B)(2)	Volatile organic compound emissions (VOC) shall not exceed 1.43 pounds per hour VOC, nor 5.85 tons per year. See A.2.a below

**2. Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

- 1. The permittee shall operate the condenser at all times whenever this emissions unit is in operation.

2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00155 pound VOC per hour per pound of ingredients.

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

1. The permittee shall operate and maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation and mixing a solvent containing material. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

Whenever the monitored value for the cooling temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the cooling temperature within the condenser immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature of the cooling water from the chiller, before entering the condenser, shall not be greater than 55 degrees Fahrenheit, when the emissions unit is in operation and mixing a solvent containing material.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall maintain daily records that document any time periods when the condenser was not in service when the emissions unit was in operation.
3. The permittee shall record the cooling water temperature on a once per shift basis.
4. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
5. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit; and
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions.

**D. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. all periods of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the cooling temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
  - e. an identification of each incident where the emissions unit was in operation when the condenser was not operating.
2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
3. The permittee shall submit deviation (excursion) reports which include the following information:

- a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
  - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.
4. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation:  
  
9.99 tons per year of any individual HAP facility-wide  
24.9 tons per year of all HAPs facility-wide  
99.9 tons per year of VOC facility-wide  
  
Applicable Compliance Method:  
  
Compliance will be demonstrated through record keeping established in section C of this permit.  
Operational Restriction:  
  
Volatile organic compound emissions (VOC) shall not exceed 0.00155 pound VOC per hour per pound of ingredients  
  
Applicable Compliance Method:  
  
Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.  
Emission Limitation:  
  
Volatile organic compound emissions (VOC) shall not exceed 1.34 pounds per hour VOC, nor 5.85 tons per year.  
  
Applicable Compliance Method:  
  
The hourly allowable VOC emission limitation was established by multiplying the uncontrolled VOC emissions factor of 0.00155 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer and by [1 minus the estimated control efficiency of 84%].  
  
If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.  
  
As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).  
  
\* the overall control efficiency of the condenser is approximately 84% (90% capture and 93% control), Emission factor, and estimated control factor were derived from stack testing performed at the facility on August 9 -10, 2000.

**F. Miscellaneous Requirements**

1. None

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

**Facility ID: 1677010204 Emissions Unit ID: P031 Issuance type: Draft 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>
P031 - Sealant Mixer coat 19 Sealant Mixer, controlled by a water cooled condenser.	OAC rule 3745-31-05(A)(3) PTI # 16-2179 issued 04/04/2002, and modified 10/19/2006. OAC rule 3745-35-07(B)(2)	Volatile organic compound emissions (VOC) shall not exceed 4.152 pounds per hour VOC, nor 5.19 tons per year. See A.2.a below

2. **Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

1. The permittee shall operate the condenser at all times whenever this emissions unit is in operation.
2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00170 pound VOC per hour per pound of ingredients.
3. In order to demonstrate compliance with the limitations listed above, the permittee has voluntarily accepted the following operational restriction:
  - a. The maximum annual operating hours for this emissions unit shall not exceed 2,500 hours, based upon a rolling, 12-month period. The permittee has sufficient operational data to demonstrate compliance with this term during the first 12-months following the issuance of this permit.

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

1. The permittee shall operate and maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation and mixing a solvent containing material. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

Whenever the monitored value for the cooling temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the cooling temperature within the condenser immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature of the cooling water from the chiller, before entering the condenser, shall not be greater than 55 degrees Fahrenheit, when the emissions unit is in operation and mixing a solvent containing material.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall maintain daily records that document any time periods when the condenser was not in service when the emissions unit was in operation.
3. The permittee shall record the cooling water temperature on a once per shift basis.
4. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
5. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;

- b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit;
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions;
  - d. the operating hours for this emissions unit; and
  - e. the calculated rolling 12-month cumulative operating rate for this emissions unit.
- D. Reporting Requirements**
1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
    - a. all periods of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.
    - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
    - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the cooling temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
    - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
    - e. an identification of each incident where the emissions unit was in operation when the condenser was not operating.
  2. The permittee shall submit deviation (excursion) reports which include the following information:
    - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
  3. The permittee shall submit deviation (excursion) reports which include the following information:
    - a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
    - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
    - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.
    - d. an identification of any 12-month period during which the cumulative operating rate exceeded 2,500 hours based on the rolling 12-month limitation established in section B.3 of this permit, and the actual cumulative operating hours for the period.
  4. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.
- E. Testing Requirements**
1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation:  
 9.99 tons per year of any individual HAP facility-wide  
 24.9 tons per year of all HAPs facility-wide  
 99.9 tons per year of VOC facility-wide  
  
 Applicable Compliance Method:  
  
 Compliance will be demonstrated through record keeping established in section C of this permit.  
 Operational Restriction:  
  
 Volatile organic compound emissions (VOC) shall not exceed 0.00170 pound VOC per hour per pound of ingredients  
  
 Applicable Compliance Method:  
  
 Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.  
 Emission Limitation:  
  
 Volatile organic compound emissions (VOC) shall not exceed 4.152 pounds per hour VOC, nor 5.19 tons per year.  
  
 Applicable Compliance Method:  
  
 The hourly allowable VOC emission limitation was established by multiplying the uncontrolled VOC emissions factor of 0.00143 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer and by [1 minus the estimated control efficiency of 84%].

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

\* the overall control efficiency of the condenser is approximately 84% (90% capture and 93% control), Emission factor, and estimated control factor were derived from stack testing performed at the facility on August 9 -10, 2000.

Operational Restriction:

The maximum annual operating hours for this emissions unit shall not exceed 2,500 based on a rolling 12-month period.

Applicable Compliance Method:

Compliance will be demonstrated through record keeping.

**F. Miscellaneous Requirements**

- 1. None

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**Facility ID: 1677010204 Emissions Unit ID: P032 Issuance type: Draft 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>
P032 - Sealant Mixer coat 20 Sealant Mixer, controlled by a water cooled condenser.	OAC rule 3745-31-05(A)(3) PTI # 16-2179 issued 04/04/2002, and modified 10/19/2006. OAC rule 3745-35-07(B)(2)	Volatile organic compound emissions (VOC) shall not exceed 2.274 pounds per hour VOC, nor 2.84 tons per year. See A.2.a below

- 2. **Additional Terms and Conditions**
  - (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

- 1. The permittee shall operate the condenser at all times whenever this emissions unit is in operation.
- 2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00155 pound VOC per hour per pound of ingredients.
- 3. In order to demonstrate compliance with the limitations listed above, the permittee has voluntarily accepted the following operational restriction:
  - a. The maximum annual operating hours for this emissions unit shall not exceed 2,500 hours, based upon a rolling, 12-month period. The permittee has sufficient operational data to demonstrate compliance with this term during the first 12-months following the issuance of this permit.

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

1. The permittee shall operate and maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation and mixing a solvent containing material. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

Whenever the monitored value for the cooling temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the cooling temperature within the condenser immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature of the cooling water from the chiller, before entering the condenser, shall not be greater than 55 degrees Fahrenheit, when the emissions unit is in operation and mixing a solvent containing material.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall maintain daily records that document any time periods when the condenser was not in service when the emissions unit was in operation.
3. The permittee shall record the cooling water temperature on a once per shift basis.
4. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
5. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit;
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions;
  - d. the operating hours for this emissions unit; and
  - e. the calculated rolling 12-month cumulative operating rate for this emissions unit.

**D. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. all periods of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the cooling temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
  - e. an identification of each incident where the emissions unit was in operation when the condenser was not operating.
2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
3. The permittee shall submit deviation (excursion) reports which include the following information:

- a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
  - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.
  - d. an identification of any 12-month period during which the cumulative operating rate exceeded 2,500 hours based on the rolling 12-month limitation established in section B.3 of this permit, and the actual cumulative operating hours for the period.
4. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation:  
9.99 tons per year of any individual HAP facility-wide  
24.9 tons per year of all HAPs facility-wide  
99.9 tons per year of VOC facility-wide  
  
Applicable Compliance Method:  
  
Compliance will be demonstrated through record keeping established in section C of this permit.  
Operational Restriction:  
  
Volatile organic compound emissions (VOC) shall not exceed 0.00155 pound VOC per hour per pound of ingredients  
  
Applicable Compliance Method:  
  
Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.  
Emission Limitation:  
  
Volatile organic compound emissions (VOC) shall not exceed 2.274 pounds per hour VOC, nor 2.84 tons per year.  
  
Applicable Compliance Method:  
  
The hourly allowable VOC emission limitation was established by multiplying the uncontrolled VOC emissions factor of 0.00143 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer and by [1 minus the estimated control efficiency of 84%].  
  
If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.  
  
As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).  
  
\* the overall control efficiency of the condenser is approximately 84% (90% capture and 93% control), Emission factor, and estimated control factor were derived from stack testing performed at the facility on August 9 -10, 2000.  
Operational Restriction:  
  
The maximum annual operating hours for this emissions unit shall not exceed 2,500 based on a rolling 12-month period.  
  
Applicable Compliance Method:  
  
Compliance will be demonstrated through record keeping.

**F. Miscellaneous Requirements**

1. None

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

Facility ID: 1677010204 Emissions Unit ID: P033 Issuance type: Draft 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>
P033 - Sealant Mixer coat 21 Sealant Mixer, controlled by a water cooled condenser.	OAC rule 3745-31-05(A)(3) PTI # 16-2179 issued 04/04/2002, and modified 10/19/2006. OAC rule 3745-35-07(B)(2)	Volatile organic compound emissions (VOC) shall not exceed 1.49 pounds per hour VOC, nor 6.55 tons per year. See A.2.a below

**2. Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

1. The permittee shall operate the condenser at all times whenever this emissions unit is in operation.
2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00127 pound VOC per hour per pound of ingredients.

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

1. The permittee shall operate and maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation and mixing a solvent containing material. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

Whenever the monitored value for the cooling temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the cooling temperature within the condenser immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature of the cooling water from the chiller, before entering the condenser, shall not be greater than 55 degrees Fahrenheit, when the emissions unit is in operation and mixing a solvent containing material.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall maintain daily records that document any time periods when the condenser was not in service when the emissions unit was in operation.
3. The permittee shall record the cooling water temperature on a once per shift basis.
4. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;

- c. the number of hours the mixer was in operation.
- 5. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit; and
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions.
- D. **Reporting Requirements**
  - 1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
    - a. all periods of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.
    - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
    - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the cooling temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
    - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
    - e. an identification of each incident where the emissions unit was in operation when the condenser was not operating.
  - 2. The permittee shall submit deviation (excursion) reports which include the following information:
    - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
  - 3. The permittee shall submit deviation (excursion) reports which include the following information:
    - a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
    - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
    - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c of this permit.
  - 4. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.
- E. **Testing Requirements**
  - 1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 

Emission Limitation:

9.99 tons per year of any individual HAP facility-wide  
 24.9 tons per year of all HAPs facility-wide  
 99.9 tons per year of VOC facility-wide

Applicable Compliance Method:

Compliance will be demonstrated through record keeping established in section C of this permit.

Operational Restriction:

Volatile organic compound emissions (VOC) shall not exceed 0.00127 pound VOC per hour per pound of ingredients

Applicable Compliance Method:

Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Emission Limitation:

Volatile organic compound emissions (VOC) shall not exceed 1.49 pounds per hour VOC, nor 6.55 tons per year.

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the uncontrolled VOC emissions

factor of 0.00143 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer and by [1 minus the estimated control efficiency of 84%].

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

\* the overall control efficiency of the condenser is approximately 84% (90% capture and 93% control), Emission factor, and estimated control factor were derived from stack testing performed at the facility on August 9 -10, 2000.

**F. Miscellaneous Requirements**

- 1. None

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

**Facility ID: 1677010204 Emissions Unit ID: P034 Issuance type: Draft 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>
P034 - COAT 22 Sealant Mixer, controlled by a water cooled condenser.	OAC rule 3745-31-05(A)(3) PTI # 16-2259 issued 10/08/2002, and modified 10/03/2006. OAC rule 3745-35-07(B)(2)	Volatile organic compound emissions (VOC) shall not exceed 0.80 pounds per hour VOC, nor 3.49 tons per year. See A.2.a below

**2. Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

- 1. The permittee shall operate the condenser at all times whenever this emissions unit is in operation.
- 2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00096 pound VOC per hour per pound of ingredients.

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

- 1. The permittee shall operate and maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation and mixing a solvent containing material. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

Whenever the monitored value for the cooling temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the cooling temperature within the condenser immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature of the cooling water from the chiller, before entering the condenser, shall not be greater than 55 degrees Fahrenheit, when the emissions unit is in operation and mixing a solvent containing material.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall maintain daily records that document any time periods when the condenser was not in service when the emissions unit was in operation.
3. The permittee shall record the cooling water temperature on a once per shift basis.
4. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
5. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit; and
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions.

**D. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. all periods of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the cooling temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
  - e. an identification of each incident where the emissions unit was in operation when the condenser was not operating.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
3. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
  - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c of this permit.

- 4. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

**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:  
 9.99 tons per year of any individual HAP facility-wide  
 24.9 tons per year of all HAPs facility-wide  
 99.9 tons per year of VOC facility-wide  
 Applicable Compliance Method:  
 Compliance will be demonstrated through record keeping established in section C of this permit.  
 Operational Restriction:  
 Volatile organic compound emissions (VOC) shall not exceed 0.00127 pound VOC per hour per pound of ingredients  
 Applicable Compliance Method:  
 Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.  
 Emission Limitation:  
 Volatile organic compound emissions (VOC) shall not exceed 0.80 pounds per hour VOC, nor 3.49 tons per year.  
 Applicable Compliance Method:  
 The hourly allowable VOC emission limitation was established by multiplying the uncontrolled VOC emissions factor of 0.00143 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer and by [1 minus the estimated control efficiency of 84%].  
 If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.  
 As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).  
 \* the overall control efficiency of the condenser is approximately 84% (90% capture and 93% control), Emission factor, and estimated control factor were derived from stack testing performed at the facility on August 9 -10, 2000.

**F. Miscellaneous Requirements**

- 1. None

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

Facility ID: 1677010204 Emissions Unit ID: P035 Issuance type: Draft 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>
P031 - Sealant Mixer coat 19 Sealant Mixer, controlled by a water cooled condenser.	OAC rule 3745-31-05(A)(3) PTI # 16-2456 issued 06/27/2006.	Volatile organic compound emissions (VOC) shall not exceed 2.175 pounds per hour VOC, nor 2.72 tons per

year.

OAC rule 3745-35-07(B)(2)

See A.2.a below

**2. Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

1. The permittee shall operate the condenser at all times whenever this emissions unit is in operation.
2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00155 pound VOC per hour per pound of ingredients.
3. In order to demonstrate compliance with the limitations listed above, the permittee has voluntarily accepted the following operational restriction:
  - a. The maximum annual operating hours for this emissions unit shall not exceed 2,500 hours, based upon a rolling, 12-month period. The permittee has sufficient operational data to demonstrate compliance with this term during the first 12-months following the issuance of this permit.

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

1. The permittee shall operate and maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation and mixing a solvent containing material. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

Whenever the monitored value for the cooling temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the cooling temperature within the condenser immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature of the cooling water from the chiller, before entering the condenser, shall not be greater than 55 degrees Fahrenheit, when the emissions unit is in operation and mixing a solvent containing material.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall maintain daily records that document any time periods when the condenser was not in service when the emissions unit was in operation.
3. The permittee shall record the cooling water temperature on a once per shift basis.
4. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
5. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit;
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions;
  - d. the operating hours for this emissions unit; and
  - e. the calculated rolling 12-month cumulative operating rate for this emissions unit.

**D. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. all periods of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the cooling temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
  - e. an identification of each incident where the emissions unit was in operation when the condenser was not operating.
2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
3. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
  - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.
  - d. an identification of any 12-month period during which the cumulative operating rate exceeded 2,500 hours based on the rolling 12-month limitation established in section B.3 of this permit, and the actual cumulative operating hours for the period.
4. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation:  
 9.99 tons per year of any individual HAP facility-wide  
 24.9 tons per year of all HAPs facility-wide  
 99.9 tons per year of VOC facility-wide  
  
 Applicable Compliance Method:  
  
 Compliance will be demonstrated through record keeping established in section C of this permit.  
 Operational Restriction:  
  
 Volatile organic compound emissions (VOC) shall not exceed 0.00155 pound VOC per hour per pound of ingredients  
  
 Applicable Compliance Method:  
  
 Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.  
 Emission Limitation:  
  
 Volatile organic compound emissions (VOC) shall not exceed 2.175 pounds per hour VOC, nor 2.72 tons per year.  
  
 Applicable Compliance Method:  
  
 The hourly allowable VOC emission limitation was established by multiplying the uncontrolled VOC emissions factor of 0.00155 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer and by [1 minus the estimated control efficiency of 84%].  
  
 If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.  
  
 As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).  
  
 \* the overall control efficiency of the condenser is approximately 84% (90% capture and 93% control), Emission factor, and estimated control factor were derived from stack testing performed at the facility on August 9 -10,

2000.

Operational Restriction:

The maximum annual operating hours for this emissions unit shall not exceed 2,500 based on a rolling 12-month period.

Applicable Compliance Method:

Compliance will be demonstrated through record keeping.

**F. Miscellaneous Requirements**

1. None

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Facility ID: 1677010204 Emissions Unit ID: P036 Issuance type: Draft 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>
P036 - Sealant Mixer coat 24 Sealant Mixer, controlled by a water cooled condenser.	OAC rule 3745-31-05(A)(3) PTI # 16-2456 issued 06/27/2006.	Volatile organic compound emissions (VOC) shall not exceed 2.20 pounds per hour VOC, nor 2.75 tons per year.
	OAC rule 3745-35-07(B)(2)	See A.2.a below

**2. Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

1. The permittee shall operate the condenser at all times whenever this emissions unit is in operation.
2. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00170 pound VOC per hour per pound of ingredients.
3. In order to demonstrate compliance with the limitations listed above, the permittee has voluntarily accepted the following operational restriction:
  - a. The maximum annual operating hours for this emissions unit shall not exceed 2,500 hours, based upon a rolling, 12-month period. The permittee has sufficient operational data to demonstrate compliance with this term during the first 12-months following the issuance of this permit.

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

1. The permittee shall operate and maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation and mixing a solvent containing material. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

Whenever the monitored value for the cooling temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the

following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the cooling temperature within the condenser immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature of the cooling water from the chiller, before entering the condenser, shall not be greater than 55 degrees Fahrenheit, when the emissions unit is in operation and mixing a solvent containing material.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall maintain daily records that document any time periods when the condenser was not in service when the emissions unit was in operation.
3. The permittee shall record the cooling water temperature on a once per shift basis.
4. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
5. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit;
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions;
  - d. the operating hours for this emissions unit; and
  - e. the calculated rolling 12-month cumulative operating rate for this emissions unit.

**D. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. all periods of time during which the temperature of the cooling water from the chiller exceeded the temperature limitation specified above.
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the cooling temperature into compliance with the acceptable value, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.
  - e. an identification of each incident where the emissions unit was in operation when the condenser was not operating.
2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
3. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
  - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for

the period.

- d. an identification of any 12-month period during which the cumulative operating rate exceeded 2,500 hours based on the rolling 12-month limitation established in section B.3 of this permit, and the actual cumulative operating hours for the period.
4. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

**E. Testing Requirements**

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

9.99 tons per year of any individual HAP facility-wide  
24.9 tons per year of all HAPs facility-wide  
99.9 tons per year of VOC facility-wide

Applicable Compliance Method:

Compliance will be demonstrated through record keeping established in section C of this permit.

Operational Restriction:

Volatile organic compound emissions (VOC) shall not exceed 0.00170 pound VOC per hour per pound of ingredients

Applicable Compliance Method:

Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Emission Limitation:

Volatile organic compound emissions (VOC) shall not exceed 2.20 pounds per hour VOC, nor 2.75 tons per year.

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the uncontrolled VOC emissions factor of 0.00170 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer and by [1 minus the estimated control efficiency of 84%].

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

\* the overall control efficiency of the condenser is approximately 84% (90% capture and 93% control), Emission factor, and estimated control factor were derived from stack testing performed at the facility on August 9 -10, 2000.

Operational Restriction:

The maximum annual operating hours for this emissions unit shall not exceed 2,500 based on a rolling 12-month period.

Applicable Compliance Method:

Compliance will be demonstrated through record keeping.

**F. Miscellaneous Requirements**

1. None

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

**Facility ID: 1677010204 Emissions Unit ID: P037 Issuance type: Draft 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>
P037 - Sealant Mixer Coat-25 - Sealant Mixer, Uncontrolled.	OAC rule 3745-31-05(A)(3) PTI # 16-2456 issued 06/27/2006.	Volatile organic compound emissions (VOC) shall not exceed 1.50 pounds per hour VOC, nor 6.57 tons per year.
	OAC rule 3745-35-07(B)(2)	See A.2.a below

- 2. **Additional Terms and Conditions**

- (a) The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year, the individual HAP emissions shall not exceed 9.99 tons per year, and the total VOC emissions from this facility shall not exceed 99.9 tons per year. To ensure these limits are met, The Ruscoe Company Plant II is committing to meet the operational restrictions listed in Section B of this permit.

**B. Operational Restrictions**

- 1. No sealant recipe shall be mixed in this unit with an emission rate greater than 0.00295 pound VOC per hour per pound of ingredients.

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

- 1. The permittee shall collect and record the following information for each and every batch, for each day during which any solvent containing material is employed:
  - a. the mixture's VOC, HAP, and combined HAPs emission rate in pounds of VOC per hour per pound of ingredients;
  - b. the total weight of the batch production, in pounds;
  - c. the number of hours the mixer was in operation.
- 2. The permittee shall collect and record the following information each month, for each month during which any solvent containing material is employed:
  - a. the calculated monthly emissions;
  - b. the calculated cumulative rolling 12-month summation of VOC, HAP and combined HAPs emissions from this emissions unit; and
  - c. the calculated cumulative rolling 12-month facility-wide summation of VOC, HAP, and combined HAPs emissions.

**D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which a sealant recipe with an emission rate greater than specified above is mixed in this emissions unit, and the actual emission rate, in pounds of VOC per hour per pound of ingredients for each such sealant batch recipe.
- 2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of any 12-month period during which the VOC emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual VOC emissions for the period.
  - b. an identification of any 12-month period during which the individual HAP emissions exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual individual HAP emissions for the period.
  - c. an identification of any 12-month period during which the combined HAPs emission rate exceeded the rolling 12-month limitation established in section A.2.a of this permit, and the actual combined HAPs emissions for the period.

These reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c of this permit.
- 3. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

**E. Testing Requirements**

- 1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation:  
  
9.99 tons per year of any individual HAP facility-wide  
24.9 tons per year of all HAPs facility-wide  
99.9 tons per year of VOC facility-wide

Applicable Compliance Method:

Compliance will be demonstrated through record keeping established in section C of this permit.

Operational Restriction:

Volatile organic compound emissions (VOC) shall not exceed 0.00295 pound VOC per hour per pound of ingredients

Applicable Compliance Method:

Compliance will be demonstrated through record keeping. If required, compliance with this operational restriction shall be based on testing in accordance with Method 25, 40 CFR Part 60, Appendix A.

Emission Limitation:

Volatile organic compound emissions (VOC) shall not exceed 1.50 pounds per hour VOC, nor 6.57 tons per year.

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the uncontrolled VOC emissions factor of 0.00295 pound of VOC emissions per hour per pound of ingredient in the mixer\* by the maximum pounds of ingredient in the mixer and by [1 minus the estimated control efficiency of 84%].

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

\* the overall control efficiency of the condenser is approximately 84% (90% capture and 93% control), Emission factor, and estimated control factor were derived from stack testing performed at the facility on August 9 -10, 2000.

F. **Miscellaneous Requirements**

1. None