

Facility ID: 1677011081 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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

Facility ID: 1677011081 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Banbury mixer/rubber compounding mill controlled with a baghouse	OAC rule 3745-31-05 See F.1 below.	4.3 lbs/hr of particulate matter 18.7 tpy of particulate matter 5% opacity as a 6-minute average, for stack emissions no visible particulate emissions from building ventilation (includes vents, doors, windows, etc.) See A.2.d
	OAC rule 3745-17-07 See F.1 below.	See A.2.d
	OAC rule 3745-17-08 See F.1 below.	See A.2.d
	OAC rule 3745-17-11	

2. Additional Terms and Conditions

- (a) The permittee shall operate and maintain a fabric filter baghouse in accordance with the manufacturer's recommendations, instructions, and operating manual(s) to adequately control particulate emissions from this emissions unit.
The permittee shall install, operate, and maintain hoods, ducts, fans, and other equipment in accordance with the manufacturer's recommendations, instructions, and operating manual(s) to adequately enclose, contain, capture, and vent particulate matter to the baghouse.
The permittee shall be in compliance with the OEPA "Air Toxics Policy", as described below in Section F.
The emission limitation required by this rule is less stringent than the emission limitation as determined by best available technology.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4 inches of water, while the emissions unit is in operation.
2. No employment of materials considered (or containing) hazardous air pollutants (HAP), as defined in OAC rule 3745-77-01(V), shall be allowed in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which

the pressure drop(s) across the baghouse(s) did not comply with the allowable range(s) specified above.

The deviation reports shall be submitted in accordance with the procedures specified in General Term and Condition #3.

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:

4.3 lbs/hr of particulate matter

Applicable Compliance Method:

Stack testing may be required to demonstrate compliance per OAC rule 3745-17-03(B)(10).

Emissions Limitation:

5% opacity as a 6-minute average, from any stack, for stack emissions

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

Emissions Limitation:

no visible particulate emissions from building ventilation

Applicable Compliance Method:

OAC rule 3745-17-03(B)(4)

F. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 16-1721, as issued on November 26, 1997: A, B, C, D, E, and F.

2. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of the emissions unit.

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

4. This permit allows the use of the processing materials and the rate of usage of these materials specified by the permittee in the permit to install application for this emissions unit. In conjunction with the BAT requirements of OAC rule 3745-31-05, pollutant ground-level concentrations were derived in accordance with the Ohio EPA's "Air Toxics Policy" ("A.T.P."), based on both the processing materials usage rate and formulation data and the volume source parameters of the facility building (there is no outside stack for the baghouse), as specified in the permit application. Compliance with the Ohio EPA's "A.T.P." was demonstrated for carbon black based on the Screen3 model and a comparison of the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for carbon black:

Pollutant: carbon black (CAS 1333-86-4)

TWA (ug/m3): 3,500

Maximum (which is also the potential) Hourly Emission Rate (lb/hr): 0.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 53

MAGLC (ug/m3): 83

5. Any of the following changes may be deemed a "modification" to the emissions unit, and as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of a modification to the operating permit or the requirement to obtain a new permit to install:

a. Any changes in the composition of the processing materials, or the use of new processing materials, that would result in the emission of a compound with a lower Time-Weighted Average (TWA) threshold level, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TWA value specified in the above table.

b. Any change in the emission rate of the emissions unit or the volume source parameters of the facility building that would result in an exceedance of the MAGLC specified in the above table.

c. A reduction in the TWA by the ACGIH for any of the processing materials emitted, that at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC.

d. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

e. Any change in the composition of the process materials, or use of new process materials, that would result in emissions of any HAPS. A current listing of HAP can be obtained from the Akron Regional Air Quality Management District.