

Facility ID: 1677100026 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: 1677100026 Emissions Unit ID: P002 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>
Aerosol filling lines #2 and #3	OAC rule 3745-31-05 (PTI 16-1735)	See A.2.a through A.2.d below.
	OAC rule 3745-21-07	See A.2.e below.

2. Additional Terms and Conditions

- (a) The permittee shall not emit more than 0.77 pound per day of organic material from propellants. The permittee shall not emit more than 17.5 pounds per day of methyl chloroform (clean-up material), also an organic material. The permittee shall limit total daily organic material emissions, from propellants and cleanup, to no more than 18.27 pounds per day. Based on an operating schedule of 365 days per year, the permittee shall be limited to 3.34 tons per year of organic material emissions from all propellants and cleanup materials employed in this emissions unit. This emissions unit is exempt from the provisions of OAC rule 3745-21-07(G), per OAC rule 3745-21-07(G)(9)(f), since the organic material emissions are not photochemically reactive, as defined by OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall not employ any photochemically reactive material, as defined by OAC rule 3745-21-01(C)(5), in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day the emissions unit is in operation:
 - a. the number of aerosol cans filled;
 - b. the daily organic material emissions from propellants, in pounds per day (this quantity equals the Akron Air Quality Agency derived emission factor of 0.0000182 pound of organic material emitted per can filled times the number of cans filled);
 - c. the company identification of each cleanup material employed;
 - d. the organic material content of each cleanup material, in pounds per gallon;
 - e. the number of gallons of each cleanup material employed;
 - f. the daily organic material emissions from cleanup materials, in pounds per day; and
 - g. the total daily organic material emissions from all propellants and cleanup materials, in pounds per day.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports identifying each day organic material (including methyl chloroform) emissions from this emissions unit exceeded the daily emission limitation(s) in this permit.
2. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.

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

E. Testing Requirements

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

0.77 lb/day of organic material from all propellants employed each day

Applicable Compliance Method:

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

17.5 lbs/day of organic material (currently all methyl chloroform) from all cleanup materials employed each day

Applicable Compliance Method:

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

18.27 lbs/day of organic material from all propellants and cleanup materials employed each day

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the recordkeeping requirements of Section C.1.

F. Miscellaneous Requirements

1. The permittee is hereby notified that this permit and all agency records concerning this permitted emissions unit are subject to public disclosure in accordance with OAC 3745-49-03.
2. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of this emissions unit.
3. This permit allows the use of the cleanup materials specified by the permittee in the application for PTI number 16-1735. In conjunction with the best available technology requirements of OAC rule 3745-31-05, pollutant ground-level concentrations were derived in accordance with the Ohio EPA's "Air Toxics Policy" based on the cleanup material usage rate, formulation data, and the design parameters of the emissions unit's exhaust system, as specified in the application.

Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for methyl chloroform based on the screen 3 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 methyl chloroform:

Pollutant: methyl chloroform

TWA (ug/m3): 1910
Maximum Hourly Emission Rate (lbs/hr): 2.02
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 884.5
MAGLC (ug/m3): 45,476
4. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Akron Air Pollution Control Agency is required, including the possible issuance of modifications to PTI number 16-1735 and the operating permit:
 - a. any changes in the composition of the cleanup materials or propellants, or the use of new cleanup materials or propellants, 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 to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of the MAGLC specified in the above table;
 - c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC 3745-31-01; and
 - d. any change in the composition of the cleanup materials or propellants, or the use of new cleanup materials or propellants, that would result in additional and/or increased emissions of any "hazardous air pollutants" as defined in OAC 3745-77-01(V).