

Facility ID: 1677110088 Issuance type: Final State Permit To Operate

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

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

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

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[Go to Part II for Emissions Unit P902](#)

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Facility ID: 1677110088 Emissions Unit ID: P901 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>
application of talc powder (CAS 68855-54-9) to rubber rolls, air emissions of particulate matter (PM) vented to and controlled by a baghouse common to P901 & P902	OAC rule 3745-31-05 (A)(3) (PTI 16-02151)	10% opacity from any stack, as a 6-minute average  10% opacity for fugitive dust, as a 3-minute average  15.4 pounds/day & 2.81 tons/year of particulate matter  All material transfer points shall be hooded and vented to a baghouse; the capture efficiency of the hood/vent system shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the points of capture to the extent possible with good engineering design; and the baghouse shall be properly operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
	OAC rule 3745-17-07 OAC rule 3745-17-08 OAC rule 3745-17-11	See sections A.2 and B.1 below for additional requirements of OAC rule 3745-31-05 (A)(3).  The emission limitations and control measures required by these rules are equal to or less stringent than the emission limitations and control measures established pursuant to OAC rule 3745-31-05 (A)(3).

2. **Additional Terms and Conditions**
  - (a) The above daily mass particulate matter emission limitation covered under OAC rule 3745-31-05 (A)(3) is based on capture and control assumptions, as demonstrated below in section E.1.c. Should compliance with this emission limitation ever become suspect, then the permittee may be required to perform emission testing, employing all applicable USEPA test methods, to establish accurate and representative emission limitations for this emissions unit.

**B. Operational Restrictions**

1. The permittee shall employ the baghouse at all times this emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the range of 1 - 10 inches of water, while the emissions unit is in operation.

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

1. The permittee shall document whether or not the baghouse was in service when the emissions unit was in operation.

2. The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be 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.
3. The permittee shall perform daily checks for any visible particulate emissions, fugitive and stack, from the emissions unit, while the emissions unit is in operation. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any abnormal visible emission incident; and
  - e. any corrective actions taken to eliminate the abnormal visible emissions.

**D. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the fabric filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across each fabric filter serving this emissions unit did not comply with the allowable range specified above.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any abnormal visible particulate emissions were observed and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

**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:
  - a. Emission Limitation: 10% opacity from any stack, as a 6-minute average  
 Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation: 10% opacity for fugitive dust, as a 3-minute average  
 Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(3).
  - c. Emission Limitations: 15.4 pounds/day & 2.81 tons/year of particulate matter  
 Applicable Compliance Method: The above emission limitations are based on capture and control assumptions as shown in the following equations:  

$$E_d = (PWR_{max})(1 - CaCo); \text{ and}$$

$$E_y = (E_d)(365 \text{ days/year})(1 \text{ ton}/2000 \text{ lbs})$$
 Where,  

$$E_d = 15.4 \text{ pounds/day of particulate matter [maximum daily emissions];}$$

$$E_y = 2.81 \text{ tons/year of particulate matter [yearly potential emissions based on above maximum hourly emissions];}$$

$$PWR_{max} = 100 \text{ pounds of talc powder/day [maximum talc process weight rate capacity];}$$

$$Ca = (0.85) \text{ [assumed 85\% capture efficiency of hood/vent system]; and}$$

$$Co = (0.995) \text{ [assumed 99.5\% control efficiency of baghouse].}$$
 If necessary, the permittee may be required to demonstrate compliance of the above limitations by testing in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 1677110088 Emissions Unit ID: P902 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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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>
application of talc powder (CAS 68855-54-9) to rubber rolls, air emissions of particulate matter (PM) vented to and controlled by baghouse common to P901 & P902	OAC rule 3745-31-05 (A)(3) (PTI 16-02151)	10% opacity from any stack, as a 6-minute average  10% opacity for fugitive dust, as a 3-minute average  10.3 pounds/day & 1.89 tons/year of particulate matter  All material transfer points shall be hooded and vented to a baghouse; the capture efficiency of the hood/vent system shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the points of capture to the extent possible with good engineering design; and the baghouse shall be properly operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
	OAC rule 3745-17-07 OAC rule 3745-17-08 OAC rule 3745-17-11	See sections A.2 and B.1 below for additional requirements of OAC rule 3745-31-05 (A)(3). The emission limitations and control measures required by these rules are equal to or less stringent than the emission limitations and control measures established pursuant to OAC rule 3745-31-05 (A)(3).

2. **Additional Terms and Conditions**
  - (a) The above daily mass particulate matter emission limitation covered under OAC rule 3745-31-05 (A)(3) is based on capture and control assumptions, as demonstrated below in section E.1.c. Should compliance with this emission limitation ever become suspect, then the permittee may be required to perform emission testing, employing all applicable USEPA test methods, to establish accurate and representative emission limitations for this emissions unit.

**B. Operational Restrictions**

1. The permittee shall employ the baghouse at all times this emissions unit is in operation.
2. Except for an initial operating period after filter media replacement to attain design filtering efficiency, the pressure drop across the baghouse serving this emissions unit shall be maintained within the range of 1 - 10 inches of water, while the emissions unit is in operation.

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

1. The permittee shall document whether or not the baghouse was in service when the emissions unit was in operation.
2. The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse serving this emissions unit, while the emissions unit is in operation. The monitoring equipment shall be 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.
3. The permittee shall perform daily checks for any visible particulate emissions, fugitive and stack, from the emissions unit, while the emissions unit is in operation. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any abnormal visible emission incident; and
  - e. any corrective actions taken to eliminate the abnormal visible emissions.
- D. Reporting Requirements**
1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the fabric filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
  2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across each fabric filter serving this emissions unit did not comply with the allowable range specified above.
  3. The permittee shall submit semiannual written reports which (a) identify all days during which any abnormal visible particulate emissions were observed and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
  4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.
- 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:
    - a. Emission Limitation: 10% opacity from any stack, as a 6-minute average
 

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).
    - b. Emission Limitation: 10% opacity for fugitive dust, as a 3-minute average
 

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(3).
    - c. Emission Limitations: 10.3 pounds/day & 1.89 tons/year of particulate matter
 

Applicable Compliance Method: The above emission limitations are based on capture and control assumptions as shown in the following equations:

$$E_d = (PWR_{max})(1 - CaCo); \text{ and}$$

$$E_y = (E_d)(365 \text{ days/year})(1 \text{ ton}/2000 \text{ lbs})$$

Where,

$$E_d = 10.3 \text{ pounds/day of particulate matter [maximum daily emissions];}$$

$$E_y = 1.89 \text{ tons/year of particulate matter [yearly potential emissions based on above maximum hourly emissions];}$$

$$PWR_{max} = 67 \text{ pounds of talc powder/day [maximum talc process weight rate capacity];}$$

$$Ca = (0.85) \text{ [assumed 85\% capture efficiency of hood/vent system]; and}$$

$$Co = (0.995) \text{ [assumed 99.5\% control efficiency of baghouse].}$$

If necessary, the permittee may be required to demonstrate compliance of the above limitations by testing in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).
- F. Miscellaneous Requirements**
1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.