

Facility ID: 1677130036 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: 1677130036 Emissions Unit ID: P011 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>
P011 - Small Container Fill Line	OAC Rule 3745-31-05(A)(3) PTI 16-02118 Issued 6/20/02	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G(2) and 3745-35-07.
	OAC Rule 3745-35-07	73.0 pounds per day and 13.3 tons per year. See 2.c below. Compliance with the special terms and conditions of this permit and with the Ohio Air Toxics Policy.
	OAC rule 3745-15-07	Facility-wide emissions shall be limited to: 49.9 TPY organic materials, 24.9 TPY hazardous air pollutants, and 9.9 TPY any single HAP. Based on a rolling 12-month summation. See 2.a below.

**2. Additional Terms and Conditions**

- (a) The Permittee shall not emit or allow the escape into the open air any smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substance or combination of substances in such a manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property.  
The Facility-wide emissions stated above shall include all the emissions from the Bulk facility and the warehouse facility combined.  
Emissions limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

**B. Operational Restrictions**

1. The emissions of organic compounds (VOC s) shall not exceed 49.9 tons per year for the entire facility as a rolling 12-month summation.
2. The emissions of all hazardous air pollutants (HAP s) combined shall not exceed 24.9 tons per year for the entire facility as a rolling 12-month summation.
3. The emissions of all hazardous air pollutants (HAP s) combined shall not exceed 24.9 tons per year for the entire facility as a rolling 12-month summation.
4. The permittee has sufficient records to demonstrate compliance with the rolling summation for the previous 12-months.

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

1. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).
2. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.

**D. Reporting Requirements**

1. The permittee shall notify the Akron Regional Air Quality Management District in writing of any daily record showing an exceedance of any emission limitation(s) or operating restriction(s). A copy of such record shall be sent to the Akron Regional Air Quality Management District within 60 days following the occurrence. The report shall include (a) the probable cause of such deviations, and (b) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. The permittee need not file quarterly deviation reports as outlined in General Term and Condition A.2.b.
2. The permittee shall notify the Akron Regional Air Quality Management District in writing of any monthly record showing an exceedance of the facility-wide emission limitation for organic compounds, combined HAPs or any individual HAP, as set forth in B.1-3. A copy of such record shall be sent to the Akron Regional Air Quality Management District within 60 days following the occurrence. The reports shall include (a) the probable cause of such deviations, and (b) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. The permittee need not file quarterly deviation reports as outlined in General Term and Condition A.2.b.
3. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAP's, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year's activities.

**E. Testing Requirements**

1. Compliance with the emission limitations in PTI #16-02118 shall be determined in accordance with the following methods:  
Emission Limitation:  
  
The total facility-wide emissions of organic materials, and Hazardous Air Pollutants.  
  
Applicable Compliance Method:  
  
Monthly and rolling 12-month records demonstrating compliance with the facility wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).

**F. Miscellaneous Requirements**

1. The permittee shall not engage in cleaning tankers, storage tanks, railcars or drums unless emissions from such cleaning operations are included against the facility wide emissions limits established.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 (or an equivalent OEPA-approved) model and comparing 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 the "worse case" pollutant(s):