

Facility ID: 1677130052 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: 1677130052 Emissions Unit ID: P007 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>  |
|---|--|---|
| Process tank to manufacture AeroGlo liquid product and aerosol concentrate dispersion. Vent condenser primarily for production control (i.e., material recovery for reuse), but will reduce organic compound (OC) emissions as secondary benefit. Fabric filter (baghouse) for control of particulate emissions (PE). All other emissions De Minimis per OAC rule 3745-15-05. | OAC rule 3745-31-05(A)(3)<br>(PTI 16-02452)  | Stack emissions shall not exceed:<br><br>0.09 pound/hour & 0.40 ton/year OCs;<br><br>0.86 pound/hour & 3.8 tons/year PE;<br><br>10% opacity, as a 6-minute average.<br><br>There shall be no visible particulate emissions from building ventilation.<br><br>The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of Part II, Sections A.2, B.1, and B.2 below.<br><br>The emissions control requirements of these rules are less stringent than the emissions control requirements established pursuant to OAC rule 3745-31-05(A)(3). |
|   | OAC rule 3745-17-07(A)<br>OAC rule 3745-17-07(B)<br>OAC rule 3745-17-08(B)<br>OAC rule 3745-17-11(B)<br>OAC rule 3745-21-07(G) |   |

**2. Additional Terms and Conditions**

- (a) The OC and PE emissions limitations established pursuant to OAC rule 3745-31-05(A)(3) are greater than the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emissions limitations.
 

However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement/modification or proposed change with types of materials processed or any other change that would increase the potential to emit for any air pollutant. Scrap process and/or product materials shall be properly disposed of. Spillage of process and/or product materials shall be promptly cleaned up to reduce the risk of fugitive emissions. Also, general housekeeping shall be performed, as needed, to minimize or eliminate emissions of fugitive dust and/or OCs. All raw, waste, and product organic solvent materials shall be stored in closed containers with tightly fitted covers. The permittee requested the annual OC emissions limit of 0.40 ton/year in order to demonstrate compliance with Ohio's "Air Toxics Policy" without the need of air pollutant dispersion modeling.

**B. Operational Restrictions**

1. The permittee shall employ the baghouse serving this emissions unit at all times the 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 to 12 inches of water, while the emissions unit is in operation.

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

1. The permittee shall document when the baghouse and/or associated air pollution control equipment serving this

emissions unit were/was not in service when the emissions unit was in operation.

2. The permittee shall properly install, 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 weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible particulate emissions from the baghouse shall be noted weekly in an operations log. If visible particulate emissions are observed from the baghouse, the permittee shall also note the following in an 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 determined cause of the abnormal emissions if a cause can be determined upon investigation;
  - d. the total duration of the visible emissions incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
4. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible emissions of fugitive dust from building ventilation. The presence or absence of any visible emissions of fugitive dust shall be noted weekly in an operations log. If visible emissions of fugitive dust are observed, the permittee shall also note the following in an 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 determined cause of the abnormal emissions if a cause can be determined upon investigation;
  - d. the total duration of the visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the 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 in which the baghouse and/or associated air pollution control equipment serving this emissions unit were/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 quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse serving this emissions unit did not comply with the allowable range specified above. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the baghouse and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).
4. The permittee shall submit on a semiannual basis a report which (a) identifies all days during which any visible emissions of fugitive dust were observed from building ventilation and (b) describes the corrective actions taken to minimize or eliminate the visible emissions of fugitive dust. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency).

**E. Testing Requirements**

1. Compliance with the emissions limitations in Section A.1 of these special terms and conditions shall be determined in accordance with the following methods:  
Emissions Limitation: 10% opacity, as a 6-minute average (stack emissions)

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).  
Emissions Limitations: 0.86 pound/hour & 3.8 tons/year PE (stack emissions)

Applicable Compliance Method: The above PE limitations are greater than the controlled potential to emit from the stack, as established below:

$$H = PL(1 - C);$$

$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

$$H = 0.86 \text{ pound/hour of PE [hourly controlled potential emissions from the stack];}$$

$$Y = 3.8 \text{ tons/year of PE [yearly controlled potential emissions from the stack];}$$

$$P = 4287 \text{ pounds/hour [maximum production rate];}$$

$$L = 0.01 \text{ [estimated production loss fraction]; and}$$

$$C = 0.99 \text{ [baghouse design control efficiency].}$$

If required, emissions testing shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 5 and the procedures specified in OAC rule 3745-17-03(B).

Emissions Limitations: 0.09 pound/hour & 0.40 ton/year OCs (stack emissions)

Applicable Compliance Method: The above OC emissions limitations are greater than the potential to emit, as established below:

$$S = H(1 - C);$$
$$Y = S(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$

Where,

S = 0.045 pound/hour of OCs [hourly potential stack emissions];  
H = 0.30 pound/hour of OCs [hourly potential process emissions];  
Y = 0.20 ton/year of OCs [yearly potential stack emissions]; and  
C = 0.85 [condenser design control efficiency].

If required, emissions testing shall be performed in accordance with OAC rule 3745-21-10(C).

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 pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee 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 a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.