Facility ID: 0125041960 Issuance type: Final State Permit To Operate

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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: 0125041960 Emissions Unit ID: R004 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Adhesive Spray Booth #4 with flash-off oven	OAC rule 3745-31-05(A)(3) (PTI 01-5904)	The emissions of VOC from this emissions unit shall not exceed 6.7 pounds per hour, excluding cleanup solvent usage, and 6.93 tons per year, including cleanup solvent usage. See sections A.2.a, A.2.d and B.1, below. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-07(G)(9)(d) and OAC rule 3745-21-09(U)(2)(e).
	OAC rule 3745-21-07(G)(9)(d)	See section A.2.a, below.
	OAC rule 3745-17-11(A)	See section A.2.b, below.
	OAC rule 3745-17-07(A)	See section A.2.b, below.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V and MACT requirements)	See sections A.2.c below.

2. **Additional Terms and Conditions**

   (a) To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

   Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).
   The requirements established pursuant to these rules are not applicable because the process does not release particulate emissions (PE) into the ambient air.
   Facility-wide emissions shall not exceed 99.9 tons of OC, 9.9 tons of individual hazardous air pollutant (HAP) emissions and 24.9 tons of total combined HAP emissions per rolling, 12-month period.

   Facility-wide emissions shall be determined from a summation of monthly emissions from R002, R004, R006 and P001 and all emissions units that are permit by rule (OAC rule 3745-31-03), de minimis (OAC rule 3745-15-05) and or exempt.

   Therefore, the provisions for Title V permitting and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products (40 CFR part 63, subpart PPPP) will not be applicable.

   1A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.
   The hourly VOC limitation for this emissions unit was established to reflect the maximum potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

B. **Operational Restrictions**

1. Each emissions unit will be operated and maintained in accordance with manufacturers recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters

(cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

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

1. The permittee shall collect and record the following information for booth 4 (R004) for each month during which adhesives are applied:

   a. the company identification for each coating and cleanup material employed and whether or not the material is a photochemically reactive material;

   b. the number of gallons of each coating and cleanup material employed in the booth;

   c. the OC and HAP content of each coating and cleanup material, in pounds per gallon;

   d. the total OC emission rate for all coatings and cleanup material, in pounds;

   e. the total HAP emission rate for all coatings and cleanup material, in pounds;

   f. the rolling, 12-month summation of adhesive usages, in gallons; and

   g. the rolling, 12-month summation of OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months).

      [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
      in pounds [i.e., the sum of (b) times (c) for each coating employed].

2. The permittee shall collect and record the following information during each month for the purpose of determining annual OC and HAP emissions from emissions units R002, R004 and exempt and deminimus emissions unit:

   a. the monthly OC and HAP emission rate for all coatings and cleanup materials, in pounds from each of the above emissions units;

   b. the rolling, 12-month summation of OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months) for all of the above emissions units;

   c. the calculated individual HAP emission for the current month, in pounds or tons, for each of the above emissions units;

   d. the calculated total HAP emissions for the current month, in pounds or tons, for each the above emissions units;

   e. the rolling 12-month summation of individual HAP emissions (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months) for all the above emissions units; and

   f. the rolling 12-month summation of total combined HAP emissions (i.e., the total combined HAP emissions from the current month added to the summation of the total combined HAP emissions from the previous 11 months) for all of the above emissions units.

3. The permittee shall calculate and record the total summation of VOC emissions from coatings and cleanup materials, [i.e., the sum of the monthly VOC emission rates from the coating material usages for the calendar year in Section C.1 plus the sum of the monthly emissions from cleanup materials for the calendar year in Section C.2].

4. The permit to install for this emissions unit in this permit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum
   Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: hexane
   TLV (mg/m3): 176
   Maximum Hourly Emission Rate (lbs/hr): 6.7 lbs/hr
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,523
   MAGLC (ug/m3): 4,190
   Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

   b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

5. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which any exceedance of the operating restrcitions set forth in section A.2.c and B1 that occurred durign the previous three calendar months (January 1 through March 31, April 1 through June 30, July 1 through September 30, and October 1 through December 31).

   These reports shall be submitted by April 15, July 15, October 15, and February 15 of each year and shall provide a summary of the record keeping required by sections C.1 for each reported exceedance.

2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. The report shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the Fee Emission Report.

E. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. and A.2 of these terms and conditions shall be determined in accordance with the following method(s):
   Emission Limitation:
   The emissions of VOC from this emissions unit shall not exceed 6.7 pounds per hour, excluding cleanup solvent usagge.

   Applicable Compliance Method:
   The hourly emission limitation was derived from the maximum VOC content in 5.41 lbs/gallon of adhesive multiplied by the maximum adhesive application rate.
   Emission Limitation:
   The emissions of VOC from this emissions unit shall not exceed 6.93 tons per year, including cleanup solvent usage.

   Applicable Compliance Method:
   Compliance with the annual VOC emission limit shall be determined by summing the monthly emissions for the calendar year, i.e., the value calculated in section C.3, above.
   Emission Limitation
   Facility-wide emissions shall not exceed 9.9 of an individual HAP and 24.9 tons total combined HAPs per year, based upon a rolling, 12-month summation of the monthly emissions.

   Applicable Compliance Method
   Compliance shall be demonstrated by record keeping in section C.2.e and C.2.f, above.
   Emissions Limitation:
   Facility-wide emissions shall not exceed 99.9 tons of OC per year, based upon a rolling, 12-month summation of the monthly emissions.

   Applicable Compliance Method:
   Compliance shall be demonstrated by record keeping in section C.2.b, above.

F. **Miscellaneous Requirements**

1. None