



State of Ohio Environmental Protection Agency

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8/28/2009

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Mr. Terry Scott  
Ashtabula Rubber Co Inc \*  
2751 West Avenue  
P.O.Box 398  
Ashtabula, OH 44005-0398

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0204010065  
Permit Number: P0084072  
Permit Type: Initial Installation  
County: Ashtabula

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Star Beacon. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 43087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
Ohio EPA-NEDO; Pennsylvania; Canada





**Permit Strategy Write-Up**

1. Check all that apply:  
 Synthetic Minor Determination  
 Netting Determination
2. Facility Description: Ashtabula Rubber Co., Inc. is a rubber manufacturing plant. The plant sprays adhesives on small metal components to bond rubber pieces.
3. Facility Emissions and Attainment Status: The annual Potential to Emit (PTE) is 44.6 tons volatile organic compound (VOC) emissions, which designates it as a minor source of VOC emissions:

MAXIMUM VOC EMISSIONS, without restrictions				
OEPA EU No.	EU Id.	Allowable VOC Emissions, tons/year	Major Source Threshold, tons/yr	Major or minor Source?
R002	Adhesive spray booth no. 342	13.4		
R003	Adhesive spray booth no. 344A	13.4		
R004	Adhesive spray booth no. 344B	13.4		
R006	Adhesive spray booth no. 341	4.37		
Total		44.57	≥100	Minor VOC source

The greatest single Hazardous Air Pollutant (HAP) emissions, is methyl isobutyl ketone (hexone) closely followed by xylene, and then toluene. The evaluation of the annual PTE for single HAP emissions finds that the facility is above the major source level of 10 tons HAP<sub>SINGLE</sub>/yr (> 2.28 lbs/hr ave.), without restrictions. The PTE is above major source levels of 25 tons of combined HAPs/yr, without restrictions.

MAXIMUM HAP EMISSIONS, without restrictions							
	Ethyl-benzene	Xylene	Toluene	Methyl isobutyl ketone	Single HAP Threshold ≥ 10 tons/yr	PTE Combined HAPs Emissions	Combined HAP Threshold ≥ 25 tons/yr
Max – lbs/hr <sup>A</sup>	0.997	9.90	3.62	10.41	Major for MIBK, xylene & toluene		
Max – tons/yr	4.367	43.36	15.85	45.59		Total 109 <sup>B</sup>	Major for combined HAPs

Note A – as estimated in applications for PTI 02-13582 and PTI 02-14529.

Note B – worst case estimates of individual HAP components may not necessarily be emitted simultaneously.

However, current Permit to Install (PTI # 02-14529) limits of 9.90 tons HAP<sub>SINGLE</sub>/rolling 12-months and 24.90 tons HAP<sub>LE</sub>/rolling 12-months from the R002 – R004 and R006 adhesive applications group make this facility a synthetic minor source of HAP emissions. It is not subject to Title V operating permit requirements.

The facility is located in the City of Ashtabula, in Ashtabula County, which is in moderate non-attainment status with the federal 8-hour ozone standard and is in attainment status for PM<sub>2.5</sub>, particulate matter which has a maximum diameter of 2.5 micrometers. The entire State of Ohio is attainment for sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>x</sub>), carbon monoxide (CO) and lead (Pb).

4. Source (Project) Emissions: Renewal and Administrative Modification FEPTIO for adhesive spray coating operations: automatic spray booths group (R002-R004) and R006 - a manual spray operation. The administrative modifications are:
  - a. Remove Ohio BAT prohibition on use of HAP containing cleanup solvents. There will be no increase in potential HAP emissions because “waste” cleanup solvents are re-used as thinners in the next batch of adhesive.



- b. There is a daily adhesive usage restriction of 18 gal/day from R002-R004 combined that incorrectly cites OAC rule 3745-21-09(U)(2)(f). This is no longer needed since the VOC content restriction of 7.1 lbs VOC/gal adhesive meets the requirements of paragraph (U)(2)(f).
- c. There is another adhesive usage restriction of 6,570 gal adhesive/rolling 12-months from just the R002-R004 group to comply with paragraph (U)(2)(f). This was not the intent if the rule and is not needed to comply with paragraph (U)(2)(f) requirements.
- d. Instead there should be a facility-wide practically enforceable restriction to assure compliance with the restricted HAP emissions limits of 9.90 tons HAP<sub>SINGLE</sub>/rolling 12-months and 24.90 tons HAP<sub>COMBINED</sub>/rolling 12-months from R002 – R004 and R006 and any new HAP emitting EU. The applicant has proposed to maintain the material usage restriction to 6,570 gal<sub>MATERIAL</sub> per rolling 12-months. The maximum volume weighted single HAP content, as xylene is 2.568 lb HAP<sub>SINGLE</sub>/gal. The maximum volume weighted combined HAP content is 3.522 lb HAP<sub>COMBINED</sub>/gal. So that restricted HAP emissions could be:

$$6,570 \text{ gal}_{\text{MATERIAL}}/\text{rolling 12-months} \times 2.568 \text{ lb HAP}_{\text{SINGLE}}/\text{gal} \times \text{ton HAP}/2,000 \text{ lbs HAP} \\ = 8.44 \text{ tons HAP}_{\text{SINGLE}}/\text{rolling 12-months facility-wide from all HAP emitting operations.}$$

$$6,570 \text{ gal}_{\text{MATERIAL}}/\text{rolling 12-months} \times 3.522 \text{ lb HAP}_{\text{COMBINED}}/\text{gal} \times \text{ton HAP}/2,000 \text{ lbs HAP} \\ = 11.57 \text{ tons HAP}_{\text{COMBINED}}/\text{rolling 12-months facility-wide from all HAP emitting operations.}$$

This synthetic minor permit will have materials usage limits, over a rolling 12-month period for a practically, federally enforceable limit as follows:

Proposed Operational Restrictions and Restricted HAP Emissions			
OEPA EU No(s).	Co. Identification	Material usage restriction, as a rolling 12-month summation	Restricted HAP emissions, as a rolling 12-month summation
R002 - R004, and R006	Spray booths 342, 344A & 344B, and 341	6,570 gallons	9.90 tons HAP <sub>SINGLE</sub> and 24.90 tons HAP <sub>MULTIPLE</sub>

- 5. Conclusion: Restricted emissions of 9.90 tons HAP<sub>SINGLE</sub>/rolling 12-months and 24.90 tons HAP<sub>MULTIPLE</sub>/rolling 12-months retains minor source status for the facility. The facility will not be subject to the Title V Operating Permit program.
- 6. Please provide additional notes or comments as necessary:

Ashtabula Rubber is not subject to the Generally Available Control Technology standards for paint stripping and miscellaneous coating operations at area sources (minor sources of HAPs), also known as 40 CFR Part 63, Subpart HHHHHH because it does not fit any applicable operation listed in 40 CFR 63.11169:

- (a) there are no paint stripping operations that involve the use of chemical strippers that contain methylene chloride; (b) there are no autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations; and (c) there are no spray application of coatings containing compounds of chromium, lead, manganese, nickel, or cadmium, collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Permit Strategy Write-Up**  
**Permit Number:** P0084072  
**Facility ID:** 0204010065

7. Permit Allowable Emissions at Each EU in the proposed project

Permit Allowable VOC Emissions		
OEPA EU No.	Emissions Unit Identification	Allowable VOC Emissions, tons/year
02	Automatic spray booth no. 342 for adhesives application to metal parts for the bonding of rubber	13.4
03	Automatic spray booth no. 344A for adhesives application to metal parts for the bonding of rubber	13.4
04	Automatic spray booth no. 344B for adhesives application to metal parts for the bonding of rubber	13.4
06	Manual spray booth no. 341 for adhesives application to metal parts for the bonding of rubber	4.37
Total		44.57

8. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	44.57



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
Ashtabula Rubber Co Inc \*

Issue Date: 8/28/2009  
Permit Number: P0084072  
Permit Type: Initial Installation  
Permit Description: PTIO for three automatic and one manual spray booth for adhesives application to metal parts for the bonding of rubber - administrative modification to remove state prohibition on use of HAP-containing cleanup materials  
Facility ID: 0204010065  
Facility Location: Ashtabula Rubber Co Inc \*  
2751 WEST AVE,  
Ashtabula, OH 44004  
Facility Description: Rubber Product Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Christine McPhee at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**DRAFT**

**Air Pollution Permit-to-Install and Operate**  
for  
Ashtabula Rubber Co Inc \*

Facility ID: 0204010065  
Permit Number: P0084072  
Permit Type: Initial Installation  
Issued: 8/28/2009  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Permit-to-Install and Operate**  
for  
Ashtabula Rubber Co Inc \*

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0084072

**Facility ID:** 0204010065

**Effective Date:** To be entered upon final issuance

# Authorization

Facility ID: 0204010065

Application Number(s): A0014574

Permit Number: P0084072

Permit Description: PTIO for three automatic and one manual spray booth for adhesives application to metal parts for the bonding of rubber - administrative modification to remove state prohibition on use of HAP-containing cleanup materials

Permit Type: Initial Installation

Permit Fee: \$800.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 8/28/2009

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Ashtabula Rubber Co Inc \*  
2751 WEST AVE  
Ashtabula, OH 44004

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 43087  
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0084072

Permit Description: PTIO for three automatic and one manual spray booth for adhesives application to metal parts for the bonding of rubber - administrative modification to remove state prohibition on use of HAP-containing cleanup materials

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>R006</b>
Company Equipment ID:	Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Automatic spray booths**

<b>Emissions Unit ID:</b>	<b>R002</b>
Company Equipment ID:	Automatic Spray Machine #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R003</b>
Company Equipment ID:	Automatic Spray Machine #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R004</b>
Company Equipment ID:	Automatic Spray Machine #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0084072

**Facility ID:** 0204010065

**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0084072

**Facility ID:** 0204010065

**Effective Date:** To be entered upon final issuance

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0084072

**Facility ID:** 0204010065

**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



1. 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).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) B.2.a) and B.2.b).
2. Federally Enforceable Permit to Install and Operate P0084072 for this air contaminant source takes into account the following voluntary restrictions, regarding the emissions units specified in B.3, as proposed by the permittee for the purpose of avoiding Title V requirements under OAC rules 3745-77-02 through 3745-77-10:
  - a) The emissions of each individual hazardous air pollutant (HAP) from the emissions units specified in B.3 shall not exceed 9.90 tons/year, based on a rolling, 12-month summation, and shall be achieved by employing the operational restrictions specified in B.4 within this permit for the emissions units specified in B.3.
  - b) The emissions of total combined HAPs from the emissions units specified in B.3 shall not exceed 24.90 tons/year, based on a rolling, 12-month summation, and shall be achieved by employing the operational restrictions specified in B.4 within this permit for the emissions units specified in B.3.
3. Voluntary restrictions to limit potential facility-wide emissions of VOCs, individual HAPs and total combined HAPs by material usage restrictions, include the following emissions units:
  - a) R002 - Automatic spray booth no. 342 for adhesives application to metal parts for the bonding of rubber;
  - b) R003 - Automatic spray booth no. 344A for adhesives application to metal parts for the bonding of rubber;
  - c) R004 - Automatic spray booth no. 344B for adhesives application to metal parts for the bonding of rubber;
  - d) R006 - Manual spray booth no. 341 for adhesives application to metal parts for the bonding of rubber; and
  - e) any new operation that has the potential to emit VOCs or HAPs.
4. Operational Restriction(s)
  - a) The maximum annual adhesives and cleanup material(s) usage for the emissions units specified in B.3 shall not exceed 6,570 gallons based upon a rolling, 12-month summation of the materials usage rates.



5. Monitoring and/or Record Keeping Requirements

- a) The permittee shall maintain monthly records of the following information for the emissions units identified in B.3:
  - (1) the rolling, 12-month individual HAP emissions for each HAP, in tons; and
  - (2) the rolling, 12-month total combined HAP emissions, in tons.

6. Reporting Requirements

- a) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - (1) each month during which exceedances of the rolling, 12-month emission limitations on individual HAPs and total combined HAPs from the emissions units specified in B.3 exceeded 9.90 tons of each individual HAP and 24.90 tons of total combined HAPs;
  - (2) for each deviation of the individual HAPs or the total combined HAPs emission limitations, the actual rolling, 12-month emissions of individual HAPs and total combined HAPs, in tons; and
  - (3) all exceedances of the rolling, 12-month limitation on materials usage.

These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit. If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

7. Testing Requirements

- a) Compliance with the allowable emission limitations in B.2 of these terms and conditions shall be determined in accordance with the following methods:
  - (1) Emission Limitations:

The emissions of each individual HAP from the emissions units specified in B.3 shall not exceed 9.90 tons/year, based on a rolling, 12-month summation.

The emissions of total combined HAPs from the emissions units specified in B.3 shall not exceed 24.90 tons/year, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in B.5.

8. Miscellaneous Requirements

- a) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0084072

**Facility ID:** 0204010065

**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. R006, Spray Booth**

**Operations, Property and/or Equipment Description:**

Manual spray booth no. 341 for adhesives application to metal parts for the bonding of rubber

a) 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. d)(3), d)(4), d)(5), d)(6) and e)(2) for toxic air contaminants requirements.

(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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-14529)	<p>Volatile organic compound (VOC) emissions shall not exceed 4.37 tons/yr from adhesives and cleanup materials.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-21-09(U)(2)(e)(ii).</p>
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11(B)(1) OAC rule 3745-17-11(C)	Exempt, per OAC rule 3745-17-11(A)(1)(i) because less than five gal/day of adhesives are employed. See b)(2)a.
d.	OAC rule 3745-21-09(U)(2)(e)(ii)	See b)(2)a.
e.	OAC rule 3745-31-05(D)(1)(b) – voluntary restriction to avoid Title V requirements	See B.2 through B.7.



(2) Additional Terms and Conditions

- a. The permittee shall not use more than 3 gallons of adhesives per day at this emissions unit.

The adhesive usage restriction of no more than 3 gal/day shall be required as long as each adhesive employed at this emissions unit cannot comply with the limit of 3.5 lbs VOC/gal of adhesive, excluding water and exempt solvents, as required by OAC rule 3745-21-09(U)(1)(d) for non-exempt emissions units.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

Adhesive and Cleanup Materials Usage and Emissions Estimates Requirements

- (1) The permittee shall collect and record the following information for each day for this emissions unit:

- a. the company identification for each adhesive and cleanup material employed;
- b. the number of gallons of each adhesive and cleanup material employed;
- c. the VOC content, excluding water and exempt solvents, and the OC content of each adhesive and cleanup material, in lbs/gal;
- d. the individual hazardous air pollutant (HAP) content of each adhesive and cleanup material, in lbs/gal;
- e. the total VOC emissions rate for all adhesives and all cleanup materials, in lbs/day; and
- f. the total OC emissions rate for all adhesives and all cleanup materials, in lbs/day.

[Notes: The adhesives information must be for the adhesives as employed, including any thinning solvents added at the emissions unit.

Total OC emissions data is needed to complete the annual fee emissions report as required by OAC chapter 3745-78.]

- (2) The permittee shall collect and record the following information for each month for this emissions unit:

- a. the total volume of all adhesives employed, in gal/month;
- b. the total volume of all adhesives and all cleanup materials employed, in gal/month;
- c. the total emissions for all adhesives and all cleanup materials of each individual HAP, in tons/month; and



- d. the total emissions for all adhesives and all cleanup materials of all HAPs combined, in tons/month.

[Note: A HAP is any air pollutant listed in or pursuant to section 112(b) of the Clean Air Act (42 U.S.C. 7401 et. Seq. and amendments).]

Toxic Air Contaminant Requirements

(3) The federally enforceable permit-to-install (FEPTI) application for PTI# 02-14529 and the previous application for PTI# 02-13582 for these emissions unit(s), R002 – R004, R006 and R007, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., X hours per day and Y days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$



- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Pollutant	Ethylbenzene	Xylene	Toluene	Ethanol	Methyl isobutyl ketone	Acetone
Maximum Emissions – lbs/hr	0.997	9.90	3.62	9.64	10.41	0.0556
Predicted 1-hr max. concentration - $\mu\text{g}/\text{m}^3$	222.5	2,208	805	2,137	2,313	98
MAGLC - $\mu\text{g}/\text{m}^3$	10,333	10,333	4,476	44,762	4,881	42,380
TLV - $\mu\text{g}/\text{m}^3$	434	434	188	1,880	205	1,780

The permittee, has demonstrated that emissions of ethylbenzene, xylene, toluene, ethanol, methyl isobutyl ketone and acetone, from emissions unit(s) R002 through R004 and R006, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute 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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in



greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute<sup>®</sup>, ORC 3704.03(F):

- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute<sup>®</sup>, ORC 3704.03(F);
- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute<sup>®</sup>, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute<sup>®</sup>, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute<sup>®</sup>, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. no more than 3 gallons of adhesives per day at this emissions unit;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).



If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Ohio EPA Northeast District Office).

- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

VOC emissions shall not exceed 4.37 tons/yr from adhesives and cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated by the summation of the daily VOC emissions for the calendar year, based upon the record keeping requirements specified in d)(1)e, divided by 2000 pounds/ton.

g) Miscellaneous Requirements

- (1) None.



**2. Emissions Unit Group - Automatic spray booths: R002, R003, R004,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
R002	Automatic spray booth no. 342 for adhesives application to metal parts for the bonding of rubber
R003	Automatic spray booth no. 344A for adhesives application to metal parts for the bonding of rubber
R004	Automatic spray booth no. 344B for adhesives application to metal parts for the bonding of rubber

a) 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. b)(2)b, c)(1), c)(2), d)(1), d)(2), d)(3), d)(4), d)(5) and e)(1)a.ii for adhesive overspray control; and
- b. d)(8), d)(9), d)(10), d)(11) and e)(3) for toxic air contaminants requirements.

(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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3) (PTI 02-14529)	The volatile organic compound (VOC) emissions shall not exceed 13.4 tons/yr from adhesives and cleanup materials from each emissions unit.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B), 3745-17-11(C) and 3745-21-09(U)(2)(f).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack serving these emissions units shall not exceed 20% opacity, as a 6-minute average, except as provided by



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		the rule.
c.	OAC rule 3745-17-11(B)(1)	The PE rate shall not exceed 0.551 lb/hr from each emissions unit. See c)(1) and c)(2).
d	OAC rule 3745-17-11(C)	See b)(2)b, d)(1), d)(2), d)(3), d)(4) and d)(5).
e.	OAC rule 3745-21-09(U)(2)(f)	The VOC content of adhesives employed in each emissions unit shall not exceed 7.1 lbs VOC/gal of adhesive, excluding water and exempt solvents. See b)(2)c.
f.	OAC rule 3745-31-05(D)(1)(b) – voluntary restriction to avoid Title V requirements	See B.2 through B.7.

(2) Additional Terms and Conditions

- a. The permittee shall not use more than 10 gallons of adhesives per day at each emissions unit.
- b. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. The control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- c. The permittee shall perform an annual study to determine the feasibility of employing adhesives with lower VOC content. This low VOC content adhesive feasibility study shall be required as long as each adhesive employed at each emissions unit cannot comply with the limit of 3.5 lbs VOC/gal of adhesive, excluding water and exempt solvents, as required by OAC rule 3745-21-09(U)(1)(d) for non-exempt emissions units.

c) Operational Restrictions

- (1) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer=s recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.



d) Monitoring and/or Recordkeeping Requirements

Adhesive Overspray Filter Requirements

- (1) 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, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
- (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer=s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer=s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

Adhesive and Cleanup Materials Usage and Emissions Estimates Requirements

- (6) The permittee shall collect and record the following information for each day for each of the emissions units specified in C.2:
  - a. the company identification for each adhesive and cleanup material employed;



- b. the number of gallons of each adhesive and cleanup material employed;
- c. the VOC content, excluding water and exempt solvents, and the OC content of each adhesive and cleanup material, in lbs/gal;
- d. the individual hazardous air pollutant (HAP) content of each adhesive and cleanup material, in lbs/gal;
- e. the total VOC emissions rate for all adhesives and all cleanup materials, in lbs/day; and
- f. the total OC emissions rate for all adhesives and all cleanup materials, in lbs/day.

[Notes: The adhesives information must be for the adhesives as employed, including any thinning solvents added at the emissions unit.

Total OC emissions data is needed to complete the annual fee emissions report as required by OAC chapter 3745-78.]

- (7) The permittee shall collect and record the following information for each month for each of the emissions units specified in C.2:
  - a. the total volume of all adhesives employed, in gal/month;
  - b. the total volume of all adhesives and all cleanup materials employed, in gal/month;
  - c. the total emissions for all adhesives and all cleanup materials of each individual HAP, in tons/month; and
  - d. the total emissions for all adhesives and all cleanup materials of all HAPs combined, in tons/month.

[Note: A HAP is any air pollutant listed in or pursuant to section 112(b) of the Clean Air Act (42 U.S.C. 7401 et. Seq. and amendments).]

Toxic Air Contaminant Requirements

- (8) The federally enforceable permit-to-install (FEPTI) application for PTI# 02-14529 and the previous application for PTI# 02-13582 for these emissions unit(s), R002 – R004, R006 and R007, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:



- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH)  $\Delta$ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\Delta$ ; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH)  $\Delta$ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices $\Delta$ ; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e.,  $\Delta X \Delta$  hours per day and  $\Delta Y \Delta$  days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):
 
$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$
- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or  $\Delta$ worst case $\Delta$  toxic contaminant(s):

Pollutant	Ethylbenzene	Xylene	Toluene	Ethanol	Methyl isobutyl ketone	Acetone
Maximum Emissions – lbs/hr	0.997	9.90	3.62	9.64	10.41	0.0556
Predicted 1-hr max. concentration - $\mu\text{g}/\text{m}^3$	222.5	2,208	805	2,137	2,313	98
MAGLC - $\mu\text{g}/\text{m}^3$	10,333	10,333	4,476	44,762	4,881	42,380
TLV - $\mu\text{g}/\text{m}^3$	434	434	188	1,880	205	1,780

The permittee, has demonstrated that emissions of ethylbenzene, xylene, toluene, ethanol, methyl isobutyl ketone and acetone, from emissions unit(s) R002 through R004 and R006, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic



air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

- (9) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute 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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F),



initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

- d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

- (11) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. no more than 0.551 lb PE/hr from each spray adhesive operation;
  - ii. the dry particulate filter shall be employed during all periods of adhesive application to control particulate emissions at each emissions unit;
  - iii. no more than 7.1 lbs VOC/gal of adhesive, excluding water and exempt solvents, at each emissions unit; and
  - iv. no more than 10 gallons of adhesives per day at each emissions unit;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Ohio EPA Northeast District Office).

- (2) The permittee shall submit reports on an annual study to determine the feasibility of employing adhesives with a lower VOC content at each emissions unit. This annual report shall be submitted, each year by February 15, unless an alternative schedule has



been established and approved by the Director (the Ohio EPA Northeast District Office). This low VOC content adhesive feasibility study shall be required as long as each adhesive employed at each emissions unit cannot comply with the limit of 3.5 lbs VOC/gal of adhesive, excluding water and exempt solvents, as required by OAC rule 3745-21-09(U)(1)(d) for non-exempt emissions units.

- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

The PE rate from adhesive overspray shall not exceed 0.551 lb/hr at each emissions unit.

Applicable Compliance Method:

Compliance may be based on the following equation:

$$PE = V \times D \times S \times (1 - TE) \times (1 - CE)$$

$$PE = 0.416 \text{ gal}_{ADHESIVE}/\text{hr} \times 8.35 \text{ lb}_{ADHESIVE}/\text{gal}_{ADHESIVE} \times 0.275 \text{ lb}_{SOLIDS}/\text{lb}_{ADHESIVE}$$

$$\times (1 - 0.50) \text{ lb PE}_{UNCTRL}/\text{lb}_{SOLIDS} \times (1 - 0.98) \text{ lb PE}/\text{lb PE}_{UNCTRL} = 0.0096 \text{ lb PE}/\text{hr.}$$

where:



PE = controlled, particulate emission rate, which is estimated to be 0.0096 lb PE/hr for each emissions unit.

V = maximum adhesive usage rate, which is 0.416 gal/hr as noted in the application for PTI 02-14529;

D = maximum adhesive density, which is 8.35 lbs/gal, as noted in the application for PTI 02-14529;

S = maximum solids content, 27.5%, by weight, as noted in the application for PTI 02-14529;

TE = transfer efficiency = lbs solids<sub>DEPOSITED</sub>/lbs solids<sub>sprayed</sub>, which may be at least 50%, for an air atomized spray application unto a flat surface as found on page 362, Chapter 10, Air Pollution Engineering Manual (1992); and

CE = filter control efficiency, which may be 0.98, as derived from engineering estimates.

c. Emission Limitation:

The VOC emissions from adhesives and cleanup materials usage shall not exceed 13.4 tons/year at each emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated by the summation of the daily VOC emissions for the calendar year, based upon the record keeping requirements specified in d)(6)e, divided by 2000 pounds/ton.

g) Miscellaneous Requirements

(1) None.