



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

4/1/2010

Certified Mail

Gene Lamoreaux
Guardian Manufacturing Company
302 Conwell Ave.
Willard, OH 44890-9525

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0339030016
Permit Number: P0105853
Permit Type: Administrative Modification
County: Huron

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,


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

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Guardian Manufacturing Company**

Facility ID: 0339030016
Permit Number: P0105853
Permit Type: Administrative Modification
Issued: 4/1/2010
Effective: 4/1/2010



Division of Air Pollution Control
Permit-to-Install
for
Guardian Manufacturing Company

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Authorization

Facility ID: 0339030016
Facility Description: Fabricated rubber products
Application Number(s): A0038872
Permit Number: P0105853
Permit Description: Administrative modification to correct carbon bed regeneration language associated with steam supply requirements.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 4/1/2010
Effective Date: 4/1/2010

This document constitutes issuance to:

Guardian Manufacturing Company
302 Conwell Ave.
Willard, OH 44890-9525

of a Permit-to-Install 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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Chris Korleski
Director



Authorization (continued)

Permit Number: P0105853
Permit Description: Administrative modification to correct carbon bed regeneration language associated with steam supply requirements.

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

Emissions Unit ID:	P801
Company Equipment ID:	P801
Superseded Permit Number:	03-11424
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P802
Company Equipment ID:	P802
Superseded Permit Number:	03-11424
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P804
Company Equipment ID:	P804
Superseded Permit Number:	03-11424
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Rubber glove dip ring operations: P801, P802, P804,

EU ID	Operations, Property and/or Equipment Description
P801	Large dip ring number 1 (formerly P001) and transferring and drying operations (drying formerly P006) for butyl rubber gloves (modification to incorporate dipping, transfer and drying operations into one emissions unit).
P802	Small dip ring number 3 (formerly P002) and transferring and drying operations (drying formerly P006) for butyl rubber gloves (modification to incorporate dipping, transfer and drying operations into one emissions unit).
P804	Large dip ring number 2 (formerly P004) and transferring and drying operations (drying formerly P006) for butyl rubber gloves (modification to incorporate dipping, transfer and drying operations into one emissions unit).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) d)(6), d)(7), and d)(8).

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)(a)	50.79 pounds organic compounds (OC) per hour (for emissions units P801, P802, and P804, combined) See b)(2)a.
b.	OAC rule 3745-31-05(D)	192.1 tons OC per rolling, 12-month period, for emissions units P801, P802, and P804, combined [see b)(2)b.]
c.	OAC rule 3745-21-07(G)(2) OAC rule 3745-21-07(M)(1)	85 percent overall OC control efficiency [see b)(2)c. and b)(2)d.]

(2) Additional Terms and Conditions

a. The "Best Available Technology" (BAT) control requirement for these emissions units has been determined to be use of a carbon adsorption control system which complies with the requirements of OAC rule 3745-21-07(M)(1) to reduce OC emissions by an overall control efficiency of at least eighty-five percent by weight [see b)(2)c.].

In order to meet the eight-five percent overall control efficiency for OC emissions from glove dipping, transferring, and drying operations, the carbon adsorption control system shall be operated in accordance with the following requirements:

- i. glove dipping operations (dip ring operations) shall be controlled with a carbon adsorption system. The carbon adsorption system shall achieve a 100 percent capture efficiency and a 93.0% minimum removal efficiency for OC emissions from the dipping operations. It should be noted that OC emissions from transferring and drying operations are not controlled, the carbon adsorption system only provides control for the dipping operations.
 - ii. The carbon adsorption system shall consist of three individual carbon beds. Two of the three carbon beds shall be on-line (i.e. the organic laden vent stream from the dip rings is passing through the bed) when dip ring operations are being performed.
 - iii. the regeneration cycle for a carbon bed (i.e. passing of steam through the carbon bed) shall last for at least 50 minutes followed by a cooling period of at least 30 minutes.
 - iv. an individual carbon bed shall only be on-line (i.e. the organic laden vent stream from the dip rings is passing through the bed) for the time periods indicated below:
 - (a) not to exceed 200 minutes when operating under "normal" load conditions. Normal load conditions are defined as any period of time when all dip ring units (P801, P802, and P804) operate simultaneously or when the large dip ring units (emission units P801 and P804) operate simultaneously.
 - (b) not to exceed 300 minutes when operating under "low" load conditions. Low load conditions are defined as any period of time when only one dip ring unit is operating or when the small dip ring unit (P802) operates simultaneously with one large dip ring unit (P801 or P804).
 - v. the boiler providing steam for carbon bed regeneration shall supply steam at a minimum of 80 psig pressure.
 - vi. the carbon adsorption control system shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.
- b. This permit establishes the following federally enforceable emission limitation for purposes of avoiding Prevention of Significant Deterioration (PSD) major source thresholds: 192.1 tons OC per rolling, 12-month period [for emissions units P801, P802 and P804 combined] based on material usage restrictions [see c)(1)].

- c. Emissions units P801, P802, and P804 shall in accordance with OAC 3745-21-07(M)(1) be equipped with a carbon adsorption control system (i.e., capture and control equipment) that reduces the OC emissions by an overall control efficiency of at least eighty-five percent, by weight. See b)(2)a.i. above for specific details regarding the capture and control requirements for the carbon adsorption control system for purposes of meeting the overall control efficiency for OC emissions.

*It should be noted that OAC rule 3745-21-07(M)(1) identifies P001, P002, and P004 as the emission unit IDs at this facility requiring control. The emission unit IDs for P001, P002, P004 have been changed to P801, P802, and P804 respectively. Additionally emissions associated with the drying operations (dry oven) were previously identified as emissions unit P006 and have been incorporated into emission units P801, P802, and P804.

- d. On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new rule does not change any requirements for these emission units. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP).

c) **Operational Restrictions**

- (1) The maximum rolling, 12-month material containing OC (measured in 'dip trays' of gloves, of varying thickness) employed in emissions units P801, P802, and P804 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [(T_i)(EF_i)] / 2000 \text{ lbs/ton} \leq 192.1$$

where,

M = the increment of the rolling 12-month period;

T_i = number of trays throughput per month (of each glove thickness) for each month within the rolling 12-month period;

EF_i = OC emission factor, in pounds per tray (based on glove thickness); and

n = total number of unique glove thicknesses

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the maximum cumulative amount of material containing OC employed in emissions units P801, P802, and P804, combined, shall not exceed the following rates:

Month	12 n
	$\sum \sum [(T_i)(EF_i)] / 2000 \text{ lbs/ton}$

	M=1 i=1 is less than or equal to
1	32.0
1-2	64.0
1-3	76.8
1-4	89.6
1-5	102.4
1-6	115.3
1-7	128.1
1-8	140.9
1-9	153.7
1-10	166.5
1-11	179.3
1-12	192.1

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual restriction on the amount of materials containing OC shall be based upon a rolling, 12-month summation.

- (2) The requirement to achieve a 100% capture efficiency for dipping operations (dip ring operations) permanent total enclosures shall be constructed to totally enclose the dip ring operations, such that all organic compound emissions are captured, contained, and directed to the control device.

The permanent total enclosures shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H₂O), whenever the emission unit(s) within the enclosure is/are in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
- a. the number trays, for each glove type dipped;
 - b. the OC emissions rate [(‘a’ x EF*) for each glove type dipped], in pounds per month; and
 - c. the total OC emissions rate (sum of ‘b’ for each glove type dipped) for the month, in tons.

* The following emissions factor have been developed for glove types dipped based on glove thickness and length:

35 mil thickness/14 inch length: 5.5 lb OC per tray;

25 mil thickness/14 inch length: 4.0 lb OC per tray;

14 mil thickness/14 inch length: 2.8 lb OC per tray;

7 mil thickness/14 inch length: 1.7 lb OC per tray

The above emissions factors were established from the results of emissions testing involving gloves with a 25 mil thickness and 14 inch length. The use of emission factors other than those presented above or use of emission factors for glove types not presented must be approved by Ohio EPA prior to use [See g)(1)].

- (2) The permittee shall collect and record the following information each month for emissions units P801, P802, and P804, combined:
 - a. the total OC emission rate (summation of d)(1)c, for all emissions units as listed above), in tons; and
 - b. the rolling 12-month OC emissions total OC, in tons.
- (3) The permittee shall measure, document /calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):
 - a. the measured diameter of each natural draft opening;
 - b. the distance measured from each natural draft opening to each OC emitting point;
 - c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;
 - d. the calculation or demonstration that the distance from each OC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and
 - e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.
- (4) The permittee shall install, operate, and maintain monitoring devices that continuously monitor the differential pressure between the inside and outside of the permanent total enclosure when emission unit(s) within the enclosure is/are in operation. The monitoring and devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the difference in pressure between the permanent total enclosure and the surrounding areas once each operating shift:

- (5) The permittee shall properly install, operate, and maintain equipment to continuously monitor the temperature of each carbon bed in the carbon adsorption control system.

The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s)

- (6) The permittee shall record the carbon bed temperature during each regeneration cycle of a carbon bed in the carbon adsorption control system. The acceptable requirement for carbon bed temperature is achieving a minimum temperature equal to or greater than 210 degrees Fahrenheit during the regeneration cycle.

- (7) The permittee shall maintain records of the following information concerning operation of the carbon adsorption control system and associated dip ring operations:

- a. identification of time periods the dip rings operated under normal and low load conditions;
- b. identification of the carbon adsorption control system settings for each time period identified in "a" above:
 - i. regeneration cycle time, in minutes
 - ii. cooling cycle time, in minutes
 - iii. standby time, in minutes
 - iv. associated on-line time, in minutes
 - v. verification that the time settings associated with items i. through i.v. above result in two individual carbon beds being on-line at all times.
 - vi. boiler steam supply operational set point, in psig

- (8) Whenever the information recorded in d)(7)b. above deviates from requirements established with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value(s) or operating condition(s) specified in this

permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. readings immediately after the corrective action was implemented of the following:
 - i. carbon bed regeneration temperature
 - ii. carbon bed operating conditions specified in this permit
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- g. The minimum values for the temperature and steam pressure during regeneration and the operating requirements of a carbon bed are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the acceptable values based upon information obtained during future testing that demonstrate compliance with the allowable emissions for the controlled operations of emissions unit(s). In addition, approved revisions to the minimum values may be incorporated into this permit by means of an administrative modification.

- (9) The Permit to Install for this emissions unit 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:

Pollutant: xylene (70% of emissions)
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 35.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3,108

MAGLC (ug/m3): 10,330

Pollutant: toluene (28% of emissions)

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 14.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,240

MAGLC (ug/m3): 4,476

(10) 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 toxic air contaminant listed in OAC rule 3745-114-01 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 toxic air contaminant listed in OAC rule 3745-114-01 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.

(11) 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 12-month combined OC emission limitation of 192.1 tons (for emissions units P801, P802, and P804, combined).
 - b. all times during which the permanent total enclosure(s) was/were not maintained at the minimum pressure differential of 0.007 inches of water.
 - c. each regeneration period (time and date) when the temperature of the carbon bed during regeneration was below the minimum value specified in this permit;
 - d. any period of time (start time and date, and end time and date) when the carbon adsorption control system was not operated in accordance with the requirements specified in b)(2)a.ii., b)(2)a.iii, b)(2)a.iv, and b)(2)a.v;
 - e. each incident of deviation described in "b", "c", or "d" (above) where a prompt investigation was not conducted;
 - f. each incident of deviation described in "b", "c", or "d" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the regeneration temperature, and operating requirements of a carbon bed and/or boiler into compliance with the acceptable values and requirements, was determined to be necessary and was not taken; and
 - g. each incident of deviation described in "b", "c", or "d" where proper records were not maintained for the investigation and/or the corrective action(s).

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 appropriate District Office or local air agency).

f) Testing Requirements

- (1) Compliance with the emission limitations specified in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
50.79 pounds OC per hour [for emissions units P801, P802 and P804 combined]

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR 60, Appendix A, Methods 1 through 4, and 18, 25, and/or 25A, as applicable.

The hourly OC emissions limit was established in accordance with the results of emissions testing conducted on October 29, 2004.

b. Emission Limitation:

192.1 tons OC per rolling 12-month period (for emissions units P801, P802, and P804, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in sections A.III.1 and 2.

c. Emission Limitation:

93 percent minimum removal efficiency, for the carbon adsorption system

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the minimum removal efficiency above in accordance with 40 CFR 60, Appendix A, Methods 1 - 4 and 18, 25, or 25A, as appropriate. The permittee demonstrated 93 percent minimum reduction efficiency in accordance with the results of emissions testing conducted on October 29, 2004.

d. Emission Limitation:

100 percent capture efficiency (for the dip ring rooms)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the 100 percent capture emissions requirement above in accordance with 40 CFR 51, Appendix M, Method 204.

The permittee demonstrated 100 percent capture efficiency in accordance with the results of emissions testing conducted on October 29, 2004.

e. Emission Limitation:

85 percent overall control efficiency

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the 100 percent capture emissions requirement above in accordance with: 40 CFR 51, Appendix

M, Method 204; and 40 CFR 60, Appendix A, Methods 1 - 4 and 18, 25, or 25A, as appropriate.

The permittee demonstrated 94 percent capture efficiency including transfer and drying operations, and 96 percent control efficiency of the carbon adsorption system, (for overall control efficiency of 90 percent) in accordance with the results of emissions testing conducted on October 29, 2004.

g) **Miscellaneous Requirements**

- (1) The permittee may request, in writing, the use of emission factors other than those presented in d)(4) and/or may request the establishment of emission factors for the dipping of new glove types . The written request shall include information used to develop the requested emission factor. Written approval from the Ohio EPA must be obtained prior to the use of an emission factor in calculating OC emissions as required in d)(4). The permittee should be advised that the dipping of new gloves types may constitute a modification as defined by OAC rule 3745-31-01. If the processing of a new glove type meets the definition of a “modification”, the permittee shall apply for and obtain a final permit-to-install prior to performing any changes to the glove dipping operations.