Ohio Environmental Protection Agency

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

5/4/2010

Certified Mail

Facility ID: 0339030016
Permit Number: P0087286
County: Huron

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

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Norwalk-Reflector. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. 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. 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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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 processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NWDO; Michigan

Huron County

PUBLIC NOTICE
Issuance of Draft Air Pollution Title V Permit
Guardian Manufacturing Company

Issue Date: 5/4/2010
Permit Number: P0087286
Permit Type: Renewal
Permit Description: Renewal Title V Permit
Facility ID: 0339030016
Facility Location: Guardian Manufacturing Company
302 Conwell Ave.,
Willard, OH 44890-9525
Facility Description: All Other 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 Title V operating permit 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 Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. The permit, which includes a detailed description of the operations, and associated statement of basis for the permit requirements, can be downloaded from the Web page: www.epa.ohio.gov/dapc

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0339030016
Facility Name:	Guardian Manufacturing Company
Facility Description:	Fabricated rubber products
Facility Address:	302 Conwell Ave., Willard, OH 44890-9525
Permit #:	P0087286, Renewal

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☐ Carbon Monoxide ☒ Volatile Organic Compounds ☐ Nitrogen Oxides
☐ Particulate Matter ≤ 10 microns ☐ Single Hazardous Air Pollutant ☐ Combined Hazardous Air Pollutants
☐ Maximum Available Control Technology Standard(s)

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	YES
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	NO
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI,	PTI #03-11424 – for emissions unit P005 – modification to more accurately reflect OC emissions

if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	P0105853 – for emissions units P801, P802 and P804 – modification to correct steam pressure set point language PTI #03-16086 – for emissions units P007 and P008 – modification to P007 to reflect change in rule applicability, initial PTI for P008

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.1			Lists Facility wide terms and conditions that are enforceable under state law only.
B.2	77-07(A)(13)		Lists insignificant emission units that have one or more applicable requirements.
B.3			Lists insignificant emission units that are “de minimus” or not subject to any applicable requirements.
B.4		40 CFR, Part 64	References compliance assurance monitoring (CAM) plan

C. Emissions Unit Terms and Conditions

Key:
EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P005	None	21-07(G)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR – States that the use of photochemically reactive liquid organic materials in this emissions unit is prohibited. M/R includes company identification of each material employed and documentation of whether or not each material is

															photochemically reactive. ET – There are no emission limitations established pursuant to this rule; therefore, no testing is required. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio.
P007 P008	None	21-07(G)	N	N	N	N	N	N	N	N	N	N	N	N	OAC rule 3745-21-07(G) does not apply because these emissions units do not use liquid organic materials. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio.
P801 P802 P804	None	21-07(G)(2)	N	N	N	N	N	N	N	N	N	N	N	N	On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio.
P005	114.5 lbs OC/hr	31-05(A)(3)(a)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR – The organic compound materials used in this emissions unit shall not exceed an OC

															content of 6.6 lbs/gallon. M/R include monthly records of the OC content of each material, volume of materials employed, OC emission rates and rolling 12-month volume consumption and emission rate totals. ET – The permittee shall demonstrate compliance with this emission limitation through the recordkeeping requirements in the permit.
P005	40.0 tons OC/rolling 12-month period	31-05(D)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR – The organic compound materials used in this emissions unit shall not exceed an OC content of 6.6 lbs/gallon. Throughput for this emissions unit shall not exceed 12,121 gallons per rolling 12-month period. M/R include monthly records of the OC content of each material, volume of materials employed, OC emission rates and rolling 12-month volume consumption and emission rate totals. ET – The permittee shall demonstrate compliance with this emission limitation through the recordkeeping requirements in the permit.
P007 P008	70.56 lbs OC/day combined, 12.9 tons OC/year combined	31-05(A)(3)(a)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	OR – None. M/R include monthly records of the number and type of each glove cured, OC emissions for each type of glove cured and annual year-to-date total OC emissions. ET - The permittee shall demonstrate compliance with this emission limitation through the recordkeeping requirements in the permit.
P801 P802 P804	50.79 lbs OC/hr combined	31-05(A)(3)(a)	N	N	Y	Y	N	N	Y	N	Y	N	N	Y	OR- Permanent total enclosures shall totally enclose the dip ring operations, and shall be maintained under negative pressure (a minimum of 0.007 “H2O). M/R include monthly records of number of trays for each glove type dipped, OC emissions rate for each glove type, total OC emissions rate and rolling 12-month OC emissions total; differential pressure between permanent total enclosure and surrounding area once/shift; continuously monitor each carbon bed temperature; record carbon bed temperature during each regeneration cycle; maintain records of dip ring load conditions and associated carbon adsorption control system settings. ET - The permittee shall demonstrate

															compliance with this emission limitation through the recordkeeping requirements in the permit. Misc – establish new emission factors.
P801 P802 P804	192.1 tons OC/rolling 12-month period combined	31-05(D)	N	N	Y	Y	N	N	Y	N	Y	N	N	Y	OR – Follow table for first 12 calendar months throughput, permanent total enclosures shall totally enclose the dip ring operations, and shall be maintained under negative pressure (a minimum of 0.007 “H2O). M/R include monthly records of number of trays for each glove type dipped, OC emissions rate for each glove type, total OC emissions rate and rolling 12-month OC emissions total; differential pressure between permanent total enclosure and surrounding area once/shift; continuously monitor each carbon bed temperature; record carbon bed temperature during each regeneration cycle; maintain records of dip ring load conditions and associated carbon adsorption control system settings. ET - The permittee shall demonstrate compliance with this emission limitation through the recordkeeping requirements in the permit. Misc – establish new emission factors
P801 P802 P804	85 % overall OC control efficiency	21-07(M)(1)	N	N	N	N	N	N	N	N	N	N	N	N	Emissions units are equipped with a carbon adsorption control system.
P801 P802 P804	None		40 CFR, Part 64	N	Y	Y	N	N	Y	N	Y	N	N	N	OR – Requires permanent total enclosures to be maintained under negative pressure. M/R requires recording control system parameters, including regeneration cycle information, and any deviations.

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Title V Permit
for
Guardian Manufacturing Company

Facility ID:	0339030016
Permit Number:	P0087286
Permit Type:	Renewal
Issued:	5/4/2010
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Guardian Manufacturing Company

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Authorization

Facility ID: 0339030016
Facility Description: Fabricated rubber products
Application Number(s): A0018219, A0018220, A0018221, A0038919
Permit Number: P0087286
Permit Description: Renewal Title V Permit
Permit Type: Renewal
Issue Date: 5/4/2010
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

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

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 Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.
(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.
(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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.
(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in

OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.
(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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.

b) 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 paragraph (E) of OAC rule 3745-77-03.

(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.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.
(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.
(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.
(Authority for term: OAC rule 3745-77-07(C))

27. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.
(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

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) 3.

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21 and 3745-31:

   a) B001, Steam Boiler #1 (PTI #03-3785, issued 8/31/88)
   b) B001, Steam Boiler #2 (PTI #03-3785, issued 8/31/88)
   c) B001, Steam Boiler #3 (PTI #03-3785, issued 8/31/88)
   d) B001, Steam Boiler #4 (PTI #03-3785, issued 8/31/88)
   e) P009, Churn #1
   f) P012, QC/R&D Lab (QC/R&D lab with two exhaust hoods)
   g) P013, Mini-lab large cure oven
   h) P014, Mini-lab small cure oven
   i) P015, Mini-lab small cure oven
   j) P016, Mini-lab small cure oven
   k) P019, Process Cooling Tower
   l) P020, Banbury Cooling Tower
   m) T001, 6,000 gallon xylene storage tank
   n) T002, 2,000 gallon toluene storage tank
   o) T003, 2,000 gallon final transfer tank for vara system
   p) T004, 12,000 gallon tank for dissolved butyl rubber
   q) T005, 550 gallon tank for dissolved butyl rubber
   r) T006, 12,000 gallon tank for mixed solvent storage
   s) T013, butyl storage tank #1, 2,000 gallon tank for holding rubber cement
   t) T014, butyl storage tank #2, 4,000 gallon tank for holding rubber cement

   [OAC rule 3745-77-07(A)(13)]

3. The following insignificant emissions units are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the “de minimus” criteria established in OAC rule 3745-15-05:

   a) P003, Large Banbury
   b) P010, Churn #2
   c) P011, Mini-lab, R&D developmental dip line
   d) P017, Glove Tumble Dryer Ovens
   e) T007, Dispense Tank #1
   f) T008, Dispense Tank #2
   g) T009, Dispense Tank #3
   h) T010, Dispense Tank #4
   i) T011, Dispense Tank #5
   j) T012, Dispense Tank #6

4. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions units P801, P802 and P804 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

   [Authority for term: 40 CFR, Part 64]

C. Emissions Unit Terms and Conditions

1. P005, Form Release Dip Tank

Operations, Property and/or Equipment Description:

form release dip tank

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)(2), d)(3), and d)(4).

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) (#03-11424, administrative modification issued 11/12/09)	114.5 lb organic compounds (OC)/hr
b.	OAC rule 3745-31-05(D)	40.0 tons OC per rolling, 12-month period See b)(2)a.
c.	OAC rule 3745-21-07(G)	See b)(2)c. and c)(2).

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitation for purposes of avoiding Prevention of Significant Deterioration (PSD) major source thresholds: 40.0 tons OC per rolling, 12-month period, based on material usage restrictions [see c)(1)].

b. The 114.5 lb OC /hr emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping or reporting requirements to ensure compliance with this emission limitation.

c. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: c)(2).

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision: None.

c) Operational Restrictions

(1) The organic compound material throughput for this emissions unit shall not exceed 12,121 gallons per rolling, 12-month period, nor an OC content of 6.6 pounds per gallon..

This emissions unit is an existing emissions unit and, as such, has existing, 12-month summation of the input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

[OAC rule 3745-77-07(A)(1) and PTI 03-11424]

(2) The permittee shall not employ any liquid organic material that is a photochemically reactive material in this emissions unit. "Photochemically reactive material" is defined in OAC rule 3745-21-01.

[OAC rule 3745-77-07(A)(1) and PTI 03-11424]

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification of each organic compound material employed;

b. documentation on whether or not each material employed is a photochemically reactive material;

c. the OC content of each material, in pounds per gallon;

d. the volume, in gallons, of each material employed;

e. the total volume of all materials employed, in gallons;

f. the OC emission rate, [d)(1)c. x d)(1)d.], in pounds, for each material;

g. the total OC emission rate for all materials, in pounds (sum of d)(1)f.);

h. the rolling 12-month volume total, in gallons (sum of d)(1)e. computed on a rolling 12-month basis); and

i. the rolling 12-month OC emission rate, in tons (sum of d)(1)g. computed on a rolling 12-month basis).

[OAC rule 3745-77-07(C)(1) and PTI 03-11424]

(2) 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: ethanol
TLV (mg/m3): 1880
Maximum Hourly Emission Rate (lbs/hr): 102.5 (increase only)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11,210
MAGLC (ug/m3): 44,760

[PTI 03-11424]

(3) 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.

[PTI 03-11424]

(4) 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.

[PTI 03-11424]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the rolling, 12-month volume usage restriction or material density restriction in c)(1).

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).

[OAC rule 3745-77-07(C)(1) and PTI 03-11424]

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of any photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI 03-11424]

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. <u>Emission Limitation</u>:
114.5 pounds OC /hr

Applicable Compliance Method:
The emission limitation is based on the emission unit's Potential to Emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

* The Potential to Emit for this emissions unit is based on a maximum throughput of 17.3 gallons organic compound material per hour, multiplied by a maximum OC content of 6.6 pounds per gallon.

b. Emission Limitation:
40.0 tons OC per rolling 12-month period

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements specified in d)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI 03-11424]

(2) Formulation data or US EPA Method 24 shall be used to determine the OC content of the material.

[OAC rule 3745-77-07(C)(1) and PTI 03-11424]

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Rubber glove curing operations:: P007, P008

EU ID	Operations, Property and/or Equipment Description
P007	Cure Oven
P008	Autoclave

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)(2).

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) (#03-16086, administrative modification issued 12/4/03)	70.56 pounds organic compounds (OC) per day from emissions units P007 and P008, combined 12.9 tons OC/year from emissions units P007 and P008, combined See b)(2)a.
b.	OAC rule 3745-21-07(G)	None. [See b)(2)b.]

(2) Additional Terms and Conditions

a. The daily and combined emission limitations represent the potential to emit of emissions units P007 and P008 based on a rubber glove production bottleneck associated with rubber glove dip ring operations (emissions units P801, P802 and P804.

b. OAC rule 3745-21-07(G) is not applicable because these emissions units do not use liquid organic materials.

On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: None.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision: None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for emissions units P007 and P008 combined:

a. The type of glove cured (e.g. 7 mil butyl, 14 mil butyl, 25 mil butyl, 35 mil butyl or 35 mil neoprene;

b. the number trays of each type of glove cured;

c. the OC emission factor (lbs OC/tray) for each type of glove cured;*

d. the OC emissions, in lbs, for each type of glove cured, [d)(1)b. x d)(1)c.];

e. the OC emissions, in tons, for all gloves cured (sum of d)(1)d.); and,

f. the annual year-to-date OC emissions, in tons, for all gloves cured (sum of d)(1)e. for each calendar month to date from January to December).

*The permittee developed emission factors based on the results of in-house emissions testing/analysis.

[OAC rule 3745-77-07(C)(1) and PTI 03-16086]

(2) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[PTI 03-16086]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

a. all exceedances of the annual combined OC emission limitation of 12.9 tons (for emissions units P007 and P008 combined).

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).

[OAC rule 3745-77-07(C)(1) and PTI 03-16086]

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:
70.56 pounds OC per day [for emissions units P007 and P008, combined]

Applicable Compliance Method:
The daily emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the emission limitation in accordance with 40 CFR 60, Appendix A, Methods 1 through 4, and 18, 25, and/or 25A, as applicable.

*The potential to emit is based on a maximum production capacity of 98 trays of gloves per day with an OC emission factor of 0.72 pounds per tray.

b. Emission Limitation:
12.9 tons OC per year (for emissions units P008 and P007, combined)

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements as specified in d)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI 03-16086]

g) Miscellaneous Requirements

(1) None.

3. 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 transfer and drying operations (drying formerly P006) for butyl rubber gloves
P802	small dip ring number 3 (formerly P002) and transfer and drying operations (drying formerly P006) for butyl rubber gloves
P804	large dip ring number 2 (formerly P004) and transfer and drying operations (drying formerly P006) for butyl rubber gloves

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)(13), d)(14), and d)(15).

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) (P0105853 administrative modification issued 4/1/10)	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.
d.	40 CFR, Part 64 – Compliance Assurance Monitoring (CAM)	See c)(2), d)(3) through d)(12), and e)(1)

(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 emissions unit IDs at this facility requiring control. The emissions unit IDs for P001, P002,and 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 emissions 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	$\sum^{12} \sum^{n} [(T_i)(EF_i)] / 2000$ 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.

[OAC rule 3745-77-07(A)(1) and P0105853]

(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.

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 64 and P0105853]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for these emissions units

a. the number trays, for each glove type dipped;

b. the OC emissions rate [(d)(1)a. x EF*) for each glove type dipped], in pounds per month; and

c. the total OC emissions rate (sum of d)(1)b. for each glove type dipped) for the month, in tons.

* The following emissions factors 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)].

[OAC rule 3745-77-07(C)(1) and P0105853]

(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.

[OAC rule 3745-77-07(C)(1) and P0105853]

(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.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and P0105853]

(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.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and P0105853]

(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).

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and P0105853]

(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.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and P0105853]

(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 d)(7)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

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and P0105853]

(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.

a. 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.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and P0105853]

(9) The CAM plan for this emissions unit has been developed for organic compound emissions. The CAM performance indicators for the carbon adsorber system controlling these emissions units are regenerative steam pressure, on-line operational limits, regenerative cycle times and minimum temperature, and capture efficiency. These were established during the most recent successful stack test, performed on July 30 and 31, 2008. When monitoring shows operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions units and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The adsorber shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(10) Carbon adsorber operating parameters shall be re-verified as a result of any changes to the operating conditions of the adsorber or emissions units. In addition to periodic monitoring of the operating parameters, the permittee also has an inspection and maintenance program for the adsorber.

Based on the results of the monitoring and inspection program, repairs to the adsorber shall be made as needed. If the current CAM indicators and/or the adsorber inspection program is considered inadequate, the permittee shall develop a Quality Improvement Plan.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(11) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(12) The permittee shall maintain a supply of necessary parts for routine repairs of the monitoring equipment, including replacement parts necessary to ensure ongoing proper operation of the adsorber.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 64]

(13) 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

[P0105853]

(14) 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.

[P0105853]

(15) 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.

[P0105853]

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 e)(1)b., e)(1)c., or e)(1)d. (above) where a prompt investigation was not conducted;

f. each incident of deviation described in e)(1)b., e)(1)c., or e)(1)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 e)(1)b., e)(1)c., or e)(1)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).

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64 and P0105853]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. Emissions testing shall be conducted approximately two and one-half (2 ½) years after permit issuance.

b. The emission testing shall be conducted to demonstrate compliance with the 93% minimum OC removal efficiency for the carbon adsorption system and the 100% OC capture efficiency for the dip ring rooms.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Methods 1-4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the control efficiency for OC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A and Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

e. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions

unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

Not later than 45 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
[OAC rule 3745-77-07(C)(1)]

(2) 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. <u>Emission Limitation</u>:
50.79 pounds OC per hour [for emissions units P801, P802 and P804 combined]

<u>Applicable Compliance Method</u>:
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. <u>Emission Limitation</u>:
192.1 tons OC per rolling 12-month period (for emissions units P801, P802, and P804, combined)

<u>Applicable Compliance Method</u>:
Compliance shall be based upon the record keeping requirements as specified in d)(1) and d)(2) in the terms and conditions of this permit.

c. Emission Limitation:
93 percent minimum removal efficiency, for the carbon adsorption system

Applicable Compliance Method:
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:
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:
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.

[OAC rule 3745-77-07(C)(1) and P0105853]

g) Miscellaneous Requirements

(1) The permittee may request, in writing, the use of emission factors other than those presented in d)(1) 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)(1). 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.

[OAC rule 3745-77-07(C)(1) and P0105853]