



Environmental
Protection Agency

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

6/10/2010

Mr. Donald Popp
The Ruscoe Company, Plant II
485 Kenmore Blvd.
P.O. Box 3858
Akron, OH 44314

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677010204
Permit Number: P0106153
Permit Type: OAC Chapter 3745-31 Modification
County: Summit

Certified Mail

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

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

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

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

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: ARAQMD



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
The Ruscoe Company, Plant II**

Facility ID: 1677010204
Permit Number: P0106153
Permit Type: OAC Chapter 3745-31 Modification
Issued: 6/10/2010
Effective: 6/10/2010
Expiration: 6/10/2015



Division of Air Pollution Control
Permit-to-Install and Operate
for
The Ruscoe Company, Plant II

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Authorization

Facility ID: 1677010204
Application Number(s): A0039290
Permit Number: P0106153
Permit Description: FEPTIO for 21 Sealant mixers, 10 controlled with chilled water condensers and 11 uncontrolled. Two new emission units, chapter 31 modification for 19 others. Supersedes Permit Number P0102651 a FESOP issued (12/05/2006).
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$7,500.00
Issue Date: 6/10/2010
Effective Date: 6/10/2010
Expiration Date: 6/10/2015
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

The Ruscoe Company, Plant II
219 E. Miller Avenue
Akron, OH 44301

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

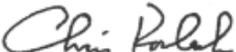
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Chris Korleski
Director



Authorization (continued)

Permit Number: P0106153
 Permit Description: FEPTIO for 21 Sealant mixers, 10 controlled with chilled water condensers and 11 uncontrolled. Two new emission units, chapter 31 modification for 19 others. Supersedes Permit Number P0102651 a FESOP issued (12/05/2006).

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

Group Name:	Controlled Emission Units
Emissions Unit ID:	P025
Company Equipment ID:	Coat 13
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P026
Company Equipment ID:	Coat 14
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P028
Company Equipment ID:	Coat 16
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P030
Company Equipment ID:	Coat 18
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P031
Company Equipment ID:	Coat 19
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P032
Company Equipment ID:	Coat 20
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P033
Company Equipment ID:	Coat 21
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P034
Company Equipment ID:	Coat 22
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P035
Company Equipment ID:	Coat 23
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P036
Company Equipment ID:	Coat 24
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P037
Company Equipment ID:	Coat 25

Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable

Group Name: Uncontrolled Emission Units

Emissions Unit ID:	P017
Company Equipment ID:	Coat 02
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	Coat 04
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P019
Company Equipment ID:	Coat 07
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P020
Company Equipment ID:	Coat 08
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P021
Company Equipment ID:	Coat 09
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P022
Company Equipment ID:	Coat 10
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	Coat 11
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P027
Company Equipment ID:	Coat 15
Superseded Permit Number:	P0102651
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P038
Company Equipment ID:	Pack 29
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P039
Company Equipment ID:	Coat 30
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that

exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

Final Permit-to-Install and Operate

The Ruscoe Company, Plant II

Permit Number: P0106153

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Effective Date: 6/10/2010

under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

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

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

B. Facility-Wide Terms and Conditions

Final Permit-to-Install and Operate

The Ruscoe Company, Plant II

Permit Number: P0106153

Facility ID: 1677010204

Effective Date: 6/10/2010

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Controlled Emission Units: P025, P026, P028, P030, P031, P032, P033, P034, P035, P036

EU ID	Operations, Property and/or Equipment Description
P025	Sealant Mixer, coat 13
P026	Sealant Mixer, coat 14
P028	Sealant Mixer, coat 16
P030	Sealant Mixer, coat 18
P031	Sealant Mixer, coat 19
P032	Sealant Mixer, coat 20
P033	Sealant Mixer, coat 21
P034	Sealant Mixer, coat 22
P035	Sealant Mixer, coat 23
P036	Sealant Mixer, coat 24

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(5), d)(6), d)(7), e)(4)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) (for all emissions units above, except P025)	See b)(2)a. and b)(2)c. below.
b.	OAC rule 3745-31-05(A)(3) as effective 11/30/01 (for emissions unit P025 only)	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (for emissions unit P025 only)	See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B)(1)	The visible emission limitation based on this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-17-08(B).
e.	OAC rule 3745-17-08(B)(3)	The permittee shall employ control measures (i.e., building enclosure) which are sufficient to eliminate visible particulate emissions of fugitive dust. (See b)(2)f. below.)
f.	OAC rule 3745-31-05(D)	See b)(2)e. below
g.	OAC rule 3745-114-01(A)	See d)(5) – (7) below.

(1) Additional Terms and Conditions

- a. The VOC emissions from the batches mixed in this emissions unit shall be collected and vented to a condenser that shall meet the monitoring and recordkeeping requirements of this permit, when the emissions unit is in operation and mixing a solvent-containing material. The overall control efficiency of the capture/control system shall be at least 84%.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by US EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the US EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once US EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- c. Particulate emissions (PE) have not been addressed in this permit since the uncontrolled potential to emit for PE from each emissions unit is negligible.
- d. This rule paragraph applies once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the controlled potential to emit for VOCs is less than 10 tons/year.
- e. The total facility-wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year*, the individual HAP

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emissions shall not exceed 9.99 tons per year*, and the total VOC emissions from this facility shall not exceed 99.9 tons per year*. To ensure these limits are met, The Ruscoe Company is committing to meet the operational restrictions listed in Section c) of this permit.

*(based on a rolling, 12-month summation of the monthly emission rates)

- f. There shall be no visible emissions of fugitive dust emitted from doors, windows and/or any other openings from the building.

c) Operational Restrictions

- (1) These emission units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the facility-wide solvent-containing sealant/adhesive production, upon issuance of this permit. The maximum facility-wide annual production for this facility shall not exceed 7,360,000 pounds of solvent-containing sealant/adhesive per rolling, 12-month period.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain a continuous temperature monitor which measures the temperature of the cooling water coming out of the chiller before entering the heat exchanger of the condenser when the emissions unit is in operation and mixing a solvent-containing material. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple and monitor shall be guaranteed by the manufacturer to be within +/- 1 percent of the temperature being measured or +/- 5 degrees Fahrenheit, whichever is greater. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

Whenever the monitored value for the cooling temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and 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 specified below, 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 description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the cooling temperature within the condenser immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

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The temperature of the cooling water from the chiller, before entering the condenser, shall not be greater than 55 degrees Fahrenheit, when the emissions unit is in operation and mixing a solvent containing material.

This value is 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.

- (2) The permittee shall maintain daily records that document any time periods when the condenser was not in service when the emissions unit was in operation.
- (3) The permittee shall record the cooling water temperature on a once per shift basis, when the emissions unit is in operation and mixing a solvent-containing material.
- (4) The permittee shall collect and record the following information each month:
 - a. the calculated monthly VOC*, HAP*, and combined HAPs* emissions, in tons, from each emissions unit;
 - b. the calculated rolling, 12-month summation of VOC, HAP and combined HAPs emissions, in tons, from each emissions unit;
 - c. the calculated rolling, 12-month summation of VOC, HAP, and combined HAPs emissions, in tons, facility-wide;
 - d. the monthly facility-wide solvent-containing sealant/adhesive production in pounds; and
 - e. the rolling, 12-month summation of the facility-wide solvent-containing sealant/adhesive production, in pounds.

*[calculated in accordance with the methods outlined in the permit application associated with this permit]

- (5) The FEPTIO application for this/these emissions unit(s), P017, P018, P019, P020, P021, P022, P023, P025, P026, P027, P028, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw

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materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: trichloroethylene w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): **53.7**

Maximum Hourly Emission Rate (lbs/hr): **7.40** (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **960**

MAGLC (ug/m3): **1,280**

The permittee has demonstrated that emissions of **trichloroethylene** from emissions unit(s) P017, P018, P019, P020, P021, P022, P023, P025, P026, P027, P028, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the

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predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

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

that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month restriction on the production of the solvent-containing sealant/adhesives mixed at the facility of 7,360,000 pounds; and
 - ii. the rolling, 12-month limitations of 9.9, 24.9 and 99.9 tons for individual HAP, combined HAPs and VOC emissions, respectively.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information in the annual PER in accordance with the requirements for visible emissions in term number b)(2)d. above:
 - a. all days during which any visible fugitive particulate emissions were observed emanating from the building;
 - b. any corrective actions taken to eliminate the visible particulate emissions;
 - c. all temperature readings that indicated the cooling water from the chiller, before entering the condenser, was greater than 55 degrees Fahrenheit, when the emissions unit is in operation and mixing a solvent-containing material;
 - d. any corrective actions taken to reduce the condenser water temperature to below 55 degrees Fahrenheit; and

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- e. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and mixing a solvent-containing material and the process emissions were not vented to the condenser.
- (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) **Testing Requirements**
- (1) Compliance with the emission limitation(s) in Section b) of these terms and conditions shall be determined in accordance with the following method(s):
- a. **Emission Limitation**

There shall be no visible emissions of fugitive dust emitted from windows, doors and/or any other openings from the building.

Applicable Compliance Method

If required, compliance with the visible particulate emission of fugitive dust limitation shall be determined in accordance with U.S. EPA Method 22 of 40 CFR Part 60, Appendix A.
 - b. **Emission Limitations:**

9.99 tons per year of any individual HAP facility-wide
24.9 tons per year of all HAPs facility-wide
99.9 tons per year of VOC facility-wide

Applicable Compliance Method:

Compliance with the emission limitations above shall be demonstrated through the record keeping requirements established in section d)(4) of this permit.
 - c. **Operational Restriction:**

VOC emissions from each emissions unit shall be collected and vented to a condenser, with overall control efficiency of the capture/control system at least 84%.

Applicable Compliance Method:

If required, compliance with this operational restriction shall be based on testing in accordance with Methods 1 - 4 and 18, 25, or 25A, as applicable, (for control efficiency) and Method 204 (for capture efficiency) of 40 CFR Part 60, Appendix A.

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d. Operational Restriction:

The maximum facility-wide annual production for this facility shall not exceed 7,360,000 pounds of solvent-containing sealant/adhesive per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the restriction above shall be demonstrated through the record keeping requirements established in section d)(4) of this permit.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Uncontrolled Emission Units: P017, P018, P019, P020, P021, P022, P023, P027, P037, P038, P039

EU ID	Operations, Property and/or Equipment Description
P017	Sealant mixer, coat 02
P018	Sealant mixer, coat-04
P019	Sealant mixer, coat 07
P020	Sealant mixer, coat 08
P021	Sealant mixer, coat 09
P022	Sealant mixer, coat 10
P023	Sealant mixer, coat 11
P027	Sealant mixer, coat 15
P037	Sealant mixer, coat 25
P038	Drum mixer, pack 29
P039	Sealant mixer, coat 30

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(2), d)(3), d)(4), e)(4)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-17-07(B)(1)	The visible emission limitation based on this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-17-08(B).
c.	OAC rule 3745-17-08(B)(3)	The permittee shall employ control

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		measures (i.e., building enclosure) which are sufficient to eliminate visible particulate emissions of fugitive dust. (See b)(2)d. below.)
d.	OAC rule 3745-31-05(D)	See b)(2)c. below
e.	OAC rule 3745-114-01(A)	See d)(2) – (4) below.

(2) Additional Terms and Conditions

- a. No sealant recipe shall be mixed in any unit with an emission rate greater than 0.003794 pound VOC per hour per pound of ingredients. This emission rate represents the single worst-case product the facility can manufacture, and therefore represents the emissions unit's potential to emit. Therefore, no monitoring, record keeping, or testing requirements are necessary to ensure compliance with this limitation.
- b. Particulate emissions (PE) have not been addressed in this permit since the uncontrolled potential to emit for PE from each emissions unit is negligible.
- c. The total facility wide annual combined hazardous air pollutant (HAPs) emissions from this facility shall not exceed 24.9 tons per year*, the individual HAP emissions shall not exceed 9.99 tons per year*, and the total VOC emissions from this facility shall not exceed 99.9 tons per year*. To ensure these limits are met, The Ruscoe Company is committing to meet the operational restrictions listed in Section c) of this permit.

*(based on a rolling, 12-month summation of the monthly emission rates)

- d. There shall be no visible emissions of fugitive dust emitted from doors, windows and/or any other openings from the building.

c) Operational Restrictions

- (1) These emission units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the facility-wide solvent-containing sealant/adhesive production, upon issuance of this permit. The maximum facility-wide annual production for this facility shall not exceed 7,360,000 pounds of solvent-containing sealant/adhesive per rolling, 12-month period.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month:
 - a. the calculated monthly VOC*, HAP*, and combined HAPs* emissions, in tons, from each emissions unit;

- b. the calculated rolling, 12-month summation of VOC, HAP and combined HAPs emissions, in tons, from each emissions unit;
- c. the calculated rolling, 12-month summation of VOC, HAP, and combined HAPs emissions, in tons, facility-wide;
- d. the monthly facility-wide solvent-containing sealant/adhesive production, in pounds; and
- e. the rolling, 12-month summation of the facility-wide solvent-containing sealant/adhesive production, in pounds.

*[calculated in accordance with the methods outlined in the permit application associated with this permit]

(2) The FEPTIO application for this/these emissions unit(s), P017, P018, P019, P020, P021, P022, P023, P025, P026, P027, P028, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

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- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: trichloroethylene w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): **53.7**

Maximum Hourly Emission Rate (lbs/hr): **7.40** (*for which toxic, if using worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): **960**

MAGLC (ug/m3): **1,280**

The permittee has demonstrated that emissions of **trichloroethylene** from emissions unit(s) P017, P018, P019, P020, P021, P022, P023, P025, P026, P027, P028, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

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If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month restriction on the production of the solvent-containing sealant/adhesives mixed at the facility of 7,360,000 pounds; and
 - ii. the rolling, 12-month limitations of 9.9, 24.9 and 99.9 tons for individual HAP, combined HAPs and VOC emissions, respectively.

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- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information in the annual PER in accordance with the requirements for visible emissions in term number b)(2)d. above:
 - a. all days during which any visible fugitive particulate emissions were observed emanating from the building; and
 - b. any corrective actions taken to eliminate the visible particulate emissions.
- (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in Section b) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation

There shall be no visible emissions of fugitive dust emitted from windows, doors and/or any other openings from the building.

Applicable Compliance Method

If required, compliance with the visible particulate emission of fugitive dust limitation shall be determined in accordance with U.S. EPA Method 22 of 40 CFR Part 60, Appendix A.

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b. Emission Limitations:

9.99 tons per year of any individual HAP facility-wide

24.9 tons per year of all HAPs facility-wide

99.9 tons per year of VOC facility-wide

Applicable Compliance Method:

Compliance with the limitations above shall be demonstrated through the record keeping requirements established in section d)(1) of this permit.

c. Operational Restriction:

No sealant recipe shall be mixed in any unit with an emission rate greater than 0.003794 pound VOC per hour per pound of ingredients

Applicable Compliance Method:

If required, compliance with this operational restriction shall be based on testing in accordance with Methods 1 - 4 and 18, 25, or 25A, as applicable, of 40 CFR Part 60, Appendix A.

d. Operational Restriction:

The maximum facility-wide annual production for this facility shall not exceed 7,360,000 pounds of solvent-containing sealant/adhesive per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the above restriction shall be demonstrated through the record keeping requirements established in section d)(1) of this permit.

g) Miscellaneous Requirements

(1) None.