



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

01/28/04

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

05-75-01-0161
Thermoseal Inc.
J. Robert Leighty
2350 Campbell Road
Sidney, OH 45365-9573

Dear J. Robert Leighty:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. 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, Ohio 43215

If you have any questions, please contact Southwest District Office.

Sincerely,

Michael W. Ahern
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: Southwest District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 01/28/04

Effective Date: 02/18/04

Expiration Date: 02/18/09

This document constitutes issuance of a Title V permit for Facility ID: 05-75-01-0161 to:
Thermoseal Inc.
2350 Campbell Road
Sidney, OH 45365-9573

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include P001 (Mixer #1), P002 (Calender #1), P003 (Calender #2), P004 (Calender #3), P005 (Calender #4), P008 (Mixer #3), P009 (Mixer #4), P011 (Mixer #2), P013 (Ethanol Distillation), P015 (Calender #5), P016 (Lurgi Toluene Decanting), P017 (Croftshaw Toluene Decanting), P018 (Vulcan Toluene Decanting), P019 (Sealex Manufacturing), and P020 (Planetary Mixing System).

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Southwest District Office
401 East Fifth Street
Dayton, OH 45402-2911
(513) 285-6357

OHIO ENVIRONMENTAL PROTECTION AGENCY

Handwritten signature of Christopher Jones

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. *State and Federally Enforceable Section*

1. **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 A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

- i. The date, place (as defined in the permit), and time of sampling or measurements.
- ii. The date(s) analyses were performed.
- iii. The company or entity that performed the analyses.
- iv. The analytical techniques or methods used.
- v. The results of such analyses.
- vi. 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:

- i. **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 by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

In accordance with OAC rule 3745-15-06, a malfunction 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))

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II 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 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 reports shall satisfy the requirements (in part) 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. OAC rule 3745-77-07(A)(3)(c) is not fully satisfied until the permittee addresses all other deviations of the federally enforceable requirements specified in the permit.

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 overrides the reporting requirements specified in this General 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 the requirements (in part) 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 General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- iii. **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 General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Written reports that identify all other deviations of the federally enforceable requirements contained in this permit, including the monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be

submitted 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.

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 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 General Term and Condition A.1.c.ii 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))

- iv. 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))
- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. 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 General Term and Condition A.1.c.i above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. 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))

4. 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))

5. 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))

6. 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 A.10 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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))

8. 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))

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. 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))

11. 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))

12. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. 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.
 - iii. 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))

13. 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))

14. 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))

15. 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))

16. 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. 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))

17. 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.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

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

19. 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))*

20. 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))*

21. 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 by the responsible official of the date on which the emissions unit was permanently shut down. Authorization to operate the affected part or activity of the stationary source shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

If 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 monitoring, record keeping, reporting, or testing 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.

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

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 quarterly, i.e., 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.)

2. Records Retention Requirements

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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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 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 General Term and Condition A.1.c.ii;
- 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; and
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility:

B001 Boiler #1 (PTI #05-162)
B002 Boiler #2 (PTI #05-3575)

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z001 Miscellaneous Natural Gas Combustion Sources
Z002 Printer #1
Z003 KL-1 Distillate Fuel Oil Tank
Z005 KL-2 Toluene Tank
Z006 KL-3 Ethanol Tank
Z007 KL-4 Recovered Ethanol Tank
Z008 KL-5 Recovered Toluene Tank
Z009 Printer #2
Z010 Laboratory Hoods and Ovens
Z011 Metal Gasket Production Operations
Z012 Waste Solvent, 8-Gallon Distillation Unit

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Mixer #1 (P001)
Activity Description: Mixer for production of mash

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Littleford mixer #1, hammermill and associated dry raw material handling equipment w/ fabric filter and solvent capture and recovery system	OAC rule 3745-31-05(A)(3) PTI #05-8246	0.17 lb particulate emissions (PE)/hr 21.24 lbs organic compounds (OC)/day See A.I.2.a and b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- The OC emissions (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) shall not exceed 58.3 tons per rolling, 30-day period and 180 tons per rolling, 365-day period.

2. Additional Terms and Conditions (continued)

- 2.b** The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall OC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records and calculations that demonstrate ongoing compliance with the April 3, 1998 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol (copies of the letter and the agreement are attached to this permit).

II. Operational Restrictions

1. The OC content of the gasket mash produced by this emissions unit shall not exceed 45%, by weight, per batch.
2. The pressure drop across the baghouse shall be maintained within the range of 0.8 to 3.5 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that list the following information for this emissions unit:
 - a. The company identification of the materials being mixed in each batch.
 - b. The amount, in pounds, of the materials being mixed in each batch.
 - c. The OC content, in percent, by weight, of the materials being mixed.
2. The permittee shall collect and record the following information each day (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) in accordance with the established requirements of the April 3, 1998 mass balance protocol agreement between the Ohio EPA and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol:
 - a. The rolling, 30-day summation of the calculated OC emissions, in tons.
 - b. The rolling, 365-day summation of the calculated OC emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the OC emissions.
3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis when the emissions unit is in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All exceedances of the rolling, 365-day OC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day OC emission limitation of 58.3 tons.
 - c. All records showing that the restriction on the rolling, 30-day average overall capture and control efficiency of the solvent recovery system was below the required 90.6%, by weight, for OCs.
 - d. All exceedances of the OC content limitation of 45%, by weight.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.2. of these terms and conditions.
3. If no deviations (excursions) occurred during a reporting period, then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
0.17 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case emissions rate for PE, the following equation may be used:

$$E = (\text{MASPH}) \times (\text{PE}) \times (\text{CE})$$

where,

$$E = \text{PE rate (lbs/hr)}$$

MASPH = maximum amount of solids per batch per hour (1,778 lbs/hr)

PE= uncontrolled PE [assume 1% loss (0.01)]*

CE= control efficiency of the baghouse [assume 99% control efficiency (1-.99)]

If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

*based upon engineering estimate

- 1.b Emission Limitation-
Visible PE shall not exceed 20% opacity, as a six minute average, except as provided by rule.

Applicable Compliance Method-

If required, the permittee shall demonstrate compliance with the visible PE above in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
21.24 lbs OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation may be determined as follows:

$$E_d = M_p \times M_{oc} \times 1\% \times (1 - C_f) \times 24$$

where:

E_d = daily OC emissions (lbs/day)

M_p = maximum hourly capacity, in pounds

M_{oc} = maximum OC content, in percent by weight

C_f = the overall capture and control efficiency

- 1.d** Emission Limitations:
58.3 tons OC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

180 tons OC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections A.III.1 and 2 of this permit.

- 1.e** Emission Limitation-
minimum overall control efficiency of 90.6% of OC, by weight

Applicable Compliance Methods-

The permittee shall demonstrate compliance with the control requirements above in accordance with the record keeping requirements specified in Sections A.III.1 and 2 of this permit.

- 1.f** Emission Limitation-
OC content not to exceed 45%, by weight

Applicable Compliance Methods-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 2.** The permittee shall employ USEPA Method 24 or formulation data to determine the OC contents of all the materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Calender #1 (P002)

Activity Description: Rubber bonded compressed gasket sheet manufacturing process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
calender #1 Troester calender w/ solvent capture and recovery system	OAC rule 3745-31-05(A)(3) PTI #05-8246	722.7 lbs organic compounds (OC)/day
	OAC rule 3745-21-07(G)(2)	See A.I.2.a and b. The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The OC emissions (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) shall not exceed 58.3 tons per rolling, 30-day period and 180 tons per rolling, 365-day period.
- 2.b The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall OC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records and calculations that demonstrate ongoing compliance with the April 3, 1998 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol (copies of the letter and the agreement are attached to this permit).

II. Operational Restrictions

1. The OC content of the gasket mash utilized by this emissions unit shall not exceed 45%, by weight, per batch.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) in accordance with the established requirements of the April 3, 1998 mass balance protocol agreement between the Ohio EPA and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol:
 - a. The rolling, 30-day summation of the calculated OC emissions, in tons.
 - b. The rolling, 365-day summation of the calculated OC emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the OC emissions.
2. Because of quality control considerations, the facility does not add solvent in the calendering process to the mash produced by the mixers. Therefore, the records required for the mixing process shall suffice to demonstrate compliance with the 45% organic content requirement for the calenders.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All exceedances of the rolling, 365-day OC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day OC emission limitation of 58.3 tons.
 - c. All records showing that the restriction on the rolling, 30-day average overall capture and control efficiency of the solvent recovery system was below the required 90.6%, by weight, for OCs.
2. If no deviations (excursions) occurred during a reporting period, then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
722.7 lbs OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation may be determined as follows:

$$Ed = \{ [(Mp \times Moc) - (Mp \times Moc \times 0.3\%)] \times (1 - Cf) \} \times 24$$

Where:

Ed = daily OC emissions (lbs/day)

Mp = maximum hourly capacity, in pounds

Moc = maximum organic compound content, in percent by weight

Cf = the overall capture and control efficiency

V. Testing Requirements (continued)

1.b Emission Limitations:

58.3 tons OC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

180 tons OC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitation-

minimum overall control efficiency of 90.6% of OC, by weight

Applicable Compliance Methods-

The permittee shall demonstrate compliance with the control requirements above in accordance with the record keeping requirements specified in Sections A.III.1 of this permit.

- 2.** The permittee shall employ USEPA Method 24 or formulation data to determine the OC contents of all the materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Calender #2 (P003)

Activity Description: Rubber bonded compressed gasket sheet manufacturing process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
calender #2 Troester calender w/ solvent capture and recovery system	OAC rule 3745-31-05(A)(3) PTI #05-8246	722.7 lbs organic compounds (OC)/day
	OAC rule 3745-21-07(G)(2)	See A.I.2.a and b. The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The OC emissions (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) shall not exceed 58.3 tons per rolling, 30-day period and 180 tons per rolling, 365-day period.
- 2.b The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall OC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records and calculations that demonstrate ongoing compliance with the April 3, 1998 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol (copies of the letter and the agreement are attached to this permit).

II. Operational Restrictions

1. The OC content of the gasket mash utilized by this emissions unit shall not exceed 45%, by weight, per batch.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) in accordance with the established requirements of the April 3, 1998 mass balance protocol agreement between the Ohio EPA and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol:
 - a. The rolling, 30-day summation of the calculated OC emissions, in tons.
 - b. The rolling, 365-day summation of the calculated OC emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the OC emissions.
2. Because of quality control considerations, the facility does not add solvent in the calendering process to the mash produced by the mixers. Therefore, the records required for the mixing process shall suffice to demonstrate compliance with the 45% organic content requirement for the calenders.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All exceedances of the rolling, 365-day OC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day OC emission limitation of 58.3 tons.
 - c. All records showing that the restriction on the rolling, 30-day average overall capture and control efficiency of the solvent recovery system was below the required 90.6%, by weight, for OCs.
2. If no deviations (excursions) occurred during a reporting period, then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
722.7 lbs OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation may be determined as follows:

$$Ed = \{ [(Mp \times Moc) - (Mp \times Moc \times 0.3\%)] \times (1 - Cf) \} \times 24$$

Where:

Ed = daily OC emissions (lbs/day)

Mp = maximum hourly capacity, in pounds

Moc = maximum organic compound content, in percent by weight

Cf = the overall capture and control efficiency

V. Testing Requirements (continued)

1.b Emission Limitations:

58.3 tons OC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

180 tons OC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitation-

minimum overall control efficiency of 90.6% of OC, by weight

Applicable Compliance Methods-

The permittee shall demonstrate compliance with the control requirements above in accordance with the record keeping requirements specified in Sections A.III.1 of this permit.

- 2.** The permittee shall employ USEPA Method 24 or formulation data to determine the OC contents of all the materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Calender #3 (P004)

Activity Description: Rubber bonded compressed gasket sheet manufacturing process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
calender #3 Troester calender w/ solvent capture and recovery system	OAC rule 3745-31-05(A)(3) PTI #05-8246	722.7 lbs organic compounds (OC)/day
	OAC rule 3745-21-07(G)(2)	See A.I.2.a and b. The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The OC emissions (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) shall not exceed 58.3 tons per rolling, 30-day period and 180 tons per rolling, 365-day period.
- 2.b The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall OC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records and calculations that demonstrate ongoing compliance with the April 3, 1998 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol (copies of the letter and the agreement are attached to this permit).

II. Operational Restrictions

1. The OC content of the gasket mash utilized by this emissions unit shall not exceed 45%, by weight, per batch.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) in accordance with the established requirements of the April 3, 1998 mass balance protocol agreement between the Ohio EPA and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol:
 - a. The rolling, 30-day summation of the calculated OC emissions, in tons.
 - b. The rolling, 365-day summation of the calculated OC emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the OC emissions.
2. Because of quality control considerations, the facility does not add solvent in the calendering process to the mash produced by the mixers. Therefore, the records required for the mixing process shall suffice to demonstrate compliance with the 45% organic content requirement for the calenders.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All exceedances of the rolling, 365-day OC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day OC emission limitation of 58.3 tons.
 - c. All records showing that the restriction on the rolling, 30-day average overall capture and control efficiency of the solvent recovery system was below the required 90.6%, by weight, for OCs.
2. If no deviations (excursions) occurred during a reporting period, then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
722.7 lbs OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation may be determined as follows:

$$Ed = \{ [(Mp \times Moc) - (Mp \times Moc \times 0.3\%)] \times (1 - Cf) \} \times 24$$

Where:

Ed = daily OC emissions (lbs/day)

Mp = maximum hourly capacity, in pounds

Moc = maximum organic compound content, in percent by weight

Cf = the overall capture and control efficiency

V. Testing Requirements (continued)

1.b Emission Limitations:

58.3 tons OC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

180 tons OC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitation-

minimum overall control efficiency of 90.6% of OC, by weight

Applicable Compliance Methods-

The permittee shall demonstrate compliance with the control requirements above in accordance with the record keeping requirements specified in Sections A.III.1 of this permit.

- 2.** The permittee shall employ USEPA Method 24 or formulation data to determine the OC contents of all the materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Calender #4 (P005)

Activity Description: Rubber bonded compressed gasket sheet manufacturing process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
calender #4 Troester calender w/ solvent capture and recovery system	OAC rule 3745-31-05(A)(3) PTI #05-8246	722.7 lbs organic compounds (OC)/day
	OAC rule 3745-21-07(G)(2)	See A.I.2.a and b. The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The OC emissions (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) shall not exceed 58.3 tons per rolling, 30-day period and 180 tons per rolling, 365-day period.
- 2.b The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall OC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records and calculations that demonstrate ongoing compliance with the April 3, 1998 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol (copies of the letter and the agreement are attached to this permit).

II. Operational Restrictions

1. The OC content of the gasket mash utilized by this emissions unit shall not exceed 45%, by weight, per batch.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) in accordance with the established requirements of the April 3, 1998 mass balance protocol agreement between the Ohio EPA and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol:
 - a. The rolling, 30-day summation of the calculated OC emissions, in tons.
 - b. The rolling, 365-day summation of the calculated OC emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the OC emissions.
2. Because of quality control considerations, the facility does not add solvent in the calendering process to the mash produced by the mixers. Therefore, the records required for the mixing process shall suffice to demonstrate compliance with the 45% organic content requirement for the calenders.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All exceedances of the rolling, 365-day OC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day OC emission limitation of 58.3 tons.
 - c. All records showing that the restriction on the rolling, 30-day average overall capture and control efficiency of the solvent recovery system was below the required 90.6%, by weight, for OCs.
2. If no deviations (excursions) occurred during a reporting period, then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
722.7 lbs OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation may be determined as follows:

$$Ed = \{ [(Mp \times Moc) - (Mp \times Moc \times 0.3\%)] \times (1 - Cf) \} \times 24$$

Where:

Ed = daily OC emissions (lbs/day)

Mp = maximum hourly capacity, in pounds

Moc = maximum organic compound content, in percent by weight

Cf = the overall capture and control efficiency

V. Testing Requirements (continued)

1.b Emission Limitations:

58.3 tons OC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

180 tons OC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitation-

minimum overall control efficiency of 90.6% of OC, by weight

Applicable Compliance Methods-

The permittee shall demonstrate compliance with the control requirements above in accordance with the record keeping requirements specified in Sections A.III.1 of this permit.

- 2.** The permittee shall employ USEPA Method 24 or formulation data to determine the OC contents of all the materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Mixer #3 (P008)
Activity Description: Mixer for production of mash

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Littleford mixer #3, hammermill and associated dry raw material handling equipment w/ fabric filter and solvent capture and recovery system	OAC rule 3745-31-05(A)(3) PTI #05-8246	0.17 lb particulate emissions (PE)/hr 21.24 lbs organic compounds (OC)/day See A.I.2.a and b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- The OC emissions (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) shall not exceed 58.3 tons per rolling, 30-day period and 180 tons per rolling, 365-day period.

2. Additional Terms and Conditions (continued)

- 2.b** The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall OC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records and calculations that demonstrate ongoing compliance with the April 3, 1998 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol (copies of the letter and the agreement are attached to this permit).

II. Operational Restrictions

1. The OC content of the gasket mash produced by this emissions unit shall not exceed 45%, by weight, per batch.
2. The pressure drop across the baghouse shall be maintained within the range of 0.8 to 3.5 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that list the following information for this emissions unit:
 - a. The company identification of the materials being mixed in each batch.
 - b. The amount, in pounds, of the materials being mixed in each batch.
 - c. The OC content, in percent, by weight, of the materials being mixed.
2. The permittee shall collect and record the following information each day (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) in accordance with the established requirements of the April 3, 1998 mass balance protocol agreement between the Ohio EPA and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol:
 - a. The rolling, 30-day summation of the calculated OC emissions, in tons.
 - b. The rolling, 365-day summation of the calculated OC emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the OC emissions.
3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis when the emissions unit is in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All exceedances of the rolling, 365-day OC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day OC emission limitation of 58.3 tons.
 - c. All records showing that the restriction on the rolling, 30-day average overall capture and control efficiency of the solvent recovery system was below the required 90.6%, by weight, for OCs.
 - d. All exceedances of the OC content limitation of 45%, by weight.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.2. of these terms and conditions.
3. If no deviations (excursions) occurred during a reporting period, then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
0.17 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case emissions rate for PE, the following equation may be used:

$$E = (\text{MASPH}) \times (\text{PE}) \times (\text{CE})$$

where,

$$E = \text{PE rate (lbs/hr)}$$

MASPH = maximum amount of solids per batch per hour (1,778 lbs/hr)

PE= uncontrolled PE [assume 1% loss (0.01)]*

CE= control efficiency of the baghouse [assume 99% control efficiency (1-.99)]

If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

*based upon engineering estimate

- 1.b Emission Limitation-
Visible PE shall not exceed 20% opacity, as a six minute average, except as provided by rule.

Applicable Compliance Method-

If required, the permittee shall demonstrate compliance with the visible PE above in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
21.24 lbs OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation may be determined as follows:

$$Ed = Mp \times Moc \times 1\% \times (1 - Cf) \times 24$$

where:

Ed = daily OC emissions (lbs/day)

Mp = maximum hourly capacity, in pounds

Moc = maximum OC content, in percent by weight

Cf = the overall capture and control efficiency

- 1.d** Emission Limitations:
58.3 tons OC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

180 tons OC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections A.III.1 and 2 of this permit.

- 1.e** Emission Limitation-
minimum overall control efficiency of 90.6% of OC, by weight

Applicable Compliance Methods-

The permittee shall demonstrate compliance with the control requirements above in accordance with the record keeping requirements specified in Sections A.III.1 and 2 of this permit.

- 1.f** Emission Limitation-
OC content not to exceed 45%, by weight

Applicable Compliance Methods-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 2.** The permittee shall employ USEPA Method 24 or formulation data to determine the OC contents of all the materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Mixer #4 (P009)
Activity Description: Mixer for production of mash

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Littleford mixer #4, hammermill and associated dry raw material handling equipment w/ fabric filter and solvent capture and recovery system	OAC rule 3745-31-05(A)(3) PTI #05-8246	0.17 lb particulate emissions (PE)/hr 21.24 lbs organic compounds (OC)/day See A.I.2.a and b.
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- The OC emissions (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) shall not exceed 58.3 tons per rolling, 30-day period and 180 tons per rolling, 365-day period.

2. Additional Terms and Conditions (continued)

- 2.b** The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall OC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records and calculations that demonstrate ongoing compliance with the April 3, 1998 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol (copies of the letter and the agreement are attached to this permit).

II. Operational Restrictions

1. The OC content of the gasket mash produced by this emissions unit shall not exceed 45%, by weight, per batch.
2. The pressure drop across the baghouse shall be maintained within the range of 0.8 to 3.5 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that list the following information for this emissions unit:
 - a. The company identification of the materials being mixed in each batch.
 - b. The amount, in pounds, of the materials being mixed in each batch.
 - c. The OC content, in percent, by weight, of the materials being mixed.
2. The permittee shall collect and record the following information each day (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) in accordance with the established requirements of the April 3, 1998 mass balance protocol agreement between the Ohio EPA and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol:
 - a. The rolling, 30-day summation of the calculated OC emissions, in tons.
 - b. The rolling, 365-day summation of the calculated OC emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the OC emissions.
3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis when the emissions unit is in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All exceedances of the rolling, 365-day OC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day OC emission limitation of 58.3 tons.
 - c. All records showing that the restriction on the rolling, 30-day average overall capture and control efficiency of the solvent recovery system was below the required 90.6%, by weight, for OCs.
 - d. All exceedances of the OC content limitation of 45%, by weight.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.2. of these terms and conditions.
3. If no deviations (excursions) occurred during a reporting period, then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
0.17 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case emissions rate for PE, the following equation may be used:

$$E = (\text{MASPH}) \times (\text{PE}) \times (\text{CE})$$

where,

$$E = \text{PE rate (lbs/hr)}$$

MASPH = maximum amount of solids per batch per hour (1,778 lbs/hr)

PE= uncontrolled PE [assume 1% loss (0.01)]*

CE= control efficiency of the baghouse [assume 99% control efficiency (1-.99)]

If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

*based upon engineering estimate

- 1.b Emission Limitation-
Visible PE shall not exceed 20% opacity, as a six minute average, except as provided by rule.

Applicable Compliance Method-

If required, the permittee shall demonstrate compliance with the visible PE above in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
21.24 lbs OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation may be determined as follows:

$$Ed = Mp \times Moc \times 1\% \times (1 - Cf) \times 24$$

where:

Ed = daily OC emissions (lbs/day)

Mp = maximum hourly capacity, in pounds

Moc = maximum OC content, in percent by weight

Cf = the overall capture and control efficiency

- 1.d** Emission Limitations:
58.3 tons OC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

180 tons OC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections A.III.1 and 2 of this permit.

- 1.e** Emission Limitation-
minimum overall control efficiency of 90.6% of OC, by weight

Applicable Compliance Methods-

The permittee shall demonstrate compliance with the control requirements above in accordance with the record keeping requirements specified in Sections A.III.1 and 2 of this permit.

- 1.f** Emission Limitation-
OC content not to exceed 45%, by weight

Applicable Compliance Methods-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 2.** The permittee shall employ USEPA Method 24 or formulation data to determine the OC contents of all the materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Mixer #2 (P011)
Activity Description: Mixer for production of mash

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Littleford mixer #2, hammermill and associated dry raw material handling equipment w/ fabric filter and solvent capture and recovery system	OAC rule 3745-31-05(A)(3) PTI #05-8246	0.17 lb particulate emissions (PE)/hr 21.24 lbs organic compounds (OC)/day See A.I.2.a and b.
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The OC emissions (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) shall not exceed 58.3 tons per rolling, 30-day period and 180 tons per rolling, 365-day period.

2. Additional Terms and Conditions (continued)

- 2.b** The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall OC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records and calculations that demonstrate ongoing compliance with the April 3, 1998 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol (copies of the letter and the agreement are attached to this permit).

II. Operational Restrictions

1. The OC content of the gasket mash produced by this emissions unit shall not exceed 45%, by weight, per batch.
2. The pressure drop across the baghouse shall be maintained within the range of 0.8 to 3.5 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that list the following information for this emissions unit:
 - a. The company identification of the materials being mixed in each batch.
 - b. The amount, in pounds, of the materials being mixed in each batch.
 - c. The OC content, in percent, by weight, of the materials being mixed.
2. The permittee shall collect and record the following information each day (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) in accordance with the established requirements of the April 3, 1998 mass balance protocol agreement between the Ohio EPA and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol:
 - a. The rolling, 30-day summation of the calculated OC emissions, in tons.
 - b. The rolling, 365-day summation of the calculated OC emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the OC emissions.
3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis when the emissions unit is in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All exceedances of the rolling, 365-day OC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day OC emission limitation of 58.3 tons.
 - c. All records showing that the restriction on the rolling, 30-day average overall capture and control efficiency of the solvent recovery system was below the required 90.6%, by weight, for OCs.
 - d. All exceedances of the OC content limitation of 45%, by weight.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.2. of these terms and conditions.
3. If no deviations (excursions) occurred during a reporting period, then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
0.17 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case emissions rate for PE, the following equation may be used:

$$E = (\text{MASPH}) \times (\text{PE}) \times (\text{CE})$$

where,

$$E = \text{PE rate (lbs/hr)}$$

MASPH = maximum amount of solids per batch per hour (1,778 lbs/hr)

PE= uncontrolled PE [assume 1% loss (0.01)]*

CE= control efficiency of the baghouse [assume 99% control efficiency (1-.99)]

If required, the permittee shall demonstrate compliance with the PE limitation above pursuant to Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

*based upon engineering estimate

- 1.b Emission Limitation-
Visible PE shall not exceed 20% opacity, as a six minute average, except as provided by rule.

Applicable Compliance Method-

If required, the permittee shall demonstrate compliance with the visible PE above in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
21.24 lbs OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation may be determined as follows:

$$E_d = M_p \times M_{oc} \times 1\% \times (1 - C_f) \times 24$$

where:

E_d = daily OC emissions (lbs/day)

M_p = maximum hourly capacity, in pounds

M_{oc} = maximum OC content, in percent by weight

C_f = the overall capture and control efficiency

- 1.d** Emission Limitations:
58.3 tons OC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

180 tons OC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections A.III.1 and 2 of this permit.

- 1.e** Emission Limitation-
minimum overall control efficiency of 90.6% of OC, by weight

Applicable Compliance Methods-

The permittee shall demonstrate compliance with the control requirements above in accordance with the record keeping requirements specified in Sections A.III.1 and 2 of this permit.

- 1.f** Emission Limitation-
OC content not to exceed 45%, by weight

Applicable Compliance Methods-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 2.** The permittee shall employ USEPA Method 24 or formulation data to determine the OC contents of all the materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ethanol Distillation (P013)
Activity Description: Continuous distillation ethanol solvent recovery system

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
ethanol distillation w/bubble cap distillation tower, two condensers, and associated piping/equipment	OAC rule 3745-31-05(A)(3) PTI #05-8246	19.1 lbs organic compounds (OC)/day See A.I.2.a and b and A.II.1. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	None, see A.II.2.

2. Additional Terms and Conditions

- 2.a The OC emissions (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) shall not exceed 58.3 tons per rolling, 30-day period and 180 tons per rolling, 365-day period.
- 2.b In order to assure compliance, the permittee shall maintain records and calculations that demonstrate ongoing compliance with the April 3, 1998 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol (copies of the letter and the agreement are attached to this permit).

II. Operational Restrictions

1. The amount of liquid organic material processed in this emissions unit shall not exceed 1,000 tons per rolling, 365-day period.
2. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that list the following information for this emissions unit:
 - a. The company identification of each liquid organic material processed.
 - b. The amount of each liquid organic material processed, in tons.
 - c. The amount of all the liquid organic materials processed (summation of b for all liquid organic materials), in tons.
 - d. The rolling, 365-day amount of liquid organic materials processed, in tons .
 - e. Documentation on whether or not each liquid organic material employed is a photochemically reactive material.
2. The permittee shall collect and record the following information each day (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) in accordance with the established requirements of the April 3, 1998 mass balance protocol agreement between the Ohio EPA and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol:
 - a. The rolling, 30-day summation of the calculated OC emissions, in tons.
 - b. The rolling, 365-day summation of the calculated OC emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the OC emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All exceedances of the rolling, 365-day OC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day OC emission limitation of 58.3 tons.
 - c. All exceedances of the rolling, 365-day amount of liquid organic compounds processed of 1,000 tons.
2. If no deviations (excursions) occurred during a reporting period, then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any photochemically reactive material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Southwest District Office) within 30 days after the exceedance occurs.
4. The permittee shall submit annual reports that summarize the actual annual amount of liquid organic material processed in this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
19.1 lbs OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation may be determined as follows:

$$Ed = [(Mp/2000 \times 3.3) + (Mp/2000 \times 0.00024)] \times 24$$

Where:

Ed = daily OC emissions (lbs/day)

Mp = maximum hourly capacity, in pounds

- 1.b** Emission Limitations:
58.3 tons OC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

180 tons OC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections A.III.1 and 2 of this permit.

- 1.c** Operational Restriction-
1000 tons of liquid organic materials/rolling, 365-day period

Applicable Compliance Methods-

The permittee shall demonstrate compliance with the operational restriction above in accordance with the record keeping requirements specified in Section A.III.1 of this permit.

- 2.** The permittee shall employ USEPA Method 24 or formulation data to determine the OC contents of all the materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Calender #5 (P015)

Activity Description: Rubber bonded compressed gasket sheet manufacturing process (Formerly Source P010)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
calender #5 Troester calender w/ solvent capture and recovery system	OAC rule 3745-31-05(A)(3) PTI #05-8246	722.7 lbs organic compounds (OC)/day
	OAC rule 3745-21-07(G)(2)	See A.I.2.a and b. The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The OC emissions (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) shall not exceed 58.3 tons per rolling, 30-day period and 180 tons per rolling, 365-day period.
- 2.b The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall OC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records and calculations that demonstrate ongoing compliance with the April 3, 1998 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol (copies of the letter and the agreement are attached to this permit).

II. Operational Restrictions

1. The OC content of the gasket mash utilized by this emissions unit shall not exceed 45%, by weight, per batch.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) in accordance with the established requirements of the April 3, 1998 mass balance protocol agreement between the Ohio EPA and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol:
 - a. The rolling, 30-day summation of the calculated OC emissions, in tons.
 - b. The rolling, 365-day summation of the calculated OC emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the OC emissions.
2. Because of quality control considerations, the facility does not add solvent in the calendaring process to the mash produced by the mixers. Therefore, the records required for the mixing process shall suffice to demonstrate compliance with the 45% organic content requirement for the calenders.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All exceedances of the rolling, 365-day OC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day OC emission limitation of 58.3 tons.
 - c. All records showing that the restriction on the rolling, 30-day average overall capture and control efficiency of the solvent recovery system was below the required 90.6%, by weight, for OCs.
2. If no deviations (excursions) occurred during a reporting period then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation:
722.7 lbs OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation may be determined as follows:

$$Ed = \{ [(Mp \times Moc) - (Mp \times Moc \times 0.3\%)] \times (1 - Cf) \} \times 24$$

Where:

Ed = daily OC emissions (lbs/day)

Mp = maximum hourly capacity, in pounds

Moc = maximum organic compound content, in percent by weight

Cf = the overall capture and control efficiency

V. Testing Requirements (continued)

1.b Emission Limitations:

58.3 tons OC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

180 tons OC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitation-

minimum overall control efficiency of 90.6% of OC, by weight

Applicable Compliance Methods-

The permittee shall demonstrate compliance with the control requirements above in accordance with the record keeping requirements specified in Sections A.III.1 of this permit.

- 2.** The permittee shall employ USEPA Method 24 or formulation data to determine the OC contents of all the materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Lurgi Toluene Decantering (P016)
Activity Description: Lurgi Toluene Decanter System

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Lurgi toluene decanting w/ two condensers, decanter tank and associated piping/equipment	OAC rule 3745-31-05(A)(3) PTI #05-8246	2.9 lbs of organic compound (OC) emissions/day
	OAC rule 3745-21-07(G)(2)	See A.I.2.a and b. The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A) (3).

2. Additional Terms and Conditions

- 2.a The OC emissions (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) shall not exceed 58.3 tons per rolling, 30-day period and 180 tons per rolling, 365-day period.
- 2.b The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall OC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records and calculations that demonstrate ongoing compliance with the April 3, 1998 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol (copies of the letter and the agreement are attached to this permit).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) in accordance with the established requirements of the April 3, 1998 mass balance protocol agreement between the Ohio EPA and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol:
 - a. The rolling, 30-day summation of the calculated OC emissions, in tons.
 - b. The rolling, 365-day summation of the calculated OC emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the OC emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All exceedances of the rolling, 365-day OC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day OC emission limitation of 58.3 tons.
 - c. All records showing that the restriction on the rolling, 30-day average overall capture and control efficiency of the solvent recovery system was below the required 90.6%, by weight, for OCs.
2. If no deviations (excursions) occurred during a reporting period then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
2.9 lbs OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation may be determined as follows:

$$Ed = \{ [(Mp/2000 * 3.3) + (Mp/2000 * 0.00024)] * (1-Cf) \} * 24$$

Where:

Ed = daily OC emissions (lbs/day)

Mp = maximum hourly capacity, in pounds

Cf = the overall capture and control efficiency

- 1.b Emission Limitations:
58.3 tons OC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

180 tons OC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

V. Testing Requirements (continued)

- 1.c** Emission Limitation-
minimum overall control efficiency of 90.6% of OC, by weight

Applicable Compliance Methods-

The permittee shall demonstrate compliance with the control requirements above in accordance with the record keeping requirements specified in Sections A.III.1 of this permit.

- 2.** The permittee shall employ USEPA Method 24 or formulation data to determine the OC contents of all the materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Croftshaw Toluene Decantering (P017)
Activity Description: Croftshaw Toluene Decanter System

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Croftshaw toluene decanting w/ two condensers, decanter tank and associated piping/equipment	OAC rule 3745-31-05(A)(3) PTI #05-8246	2.9 lbs of organic compound (OC) emissions/day
	OAC rule 3745-21-07(G)(2)	See A.I.2.a and b. The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A) (3).

2. Additional Terms and Conditions

- 2.a The OC emissions (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) shall not exceed 58.3 tons per rolling, 30-day period and 180 tons per rolling, 365-day period.
- 2.b The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall OC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records and calculations that demonstrate ongoing compliance with the April 3, 1998 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol (copies of the letter and the agreement are attached to this permit).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) in accordance with the established requirements of the April 3, 1998 mass balance protocol agreement between the Ohio EPA and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol:
 - a. The rolling, 30-day summation of the calculated OC emissions, in tons.
 - b. The rolling, 365-day summation of the calculated OC emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the OC emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All exceedances of the rolling, 365-day OC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day OC emission limitation of 58.3 tons.
 - c. All records showing that the restriction on the rolling, 30-day average overall capture and control efficiency of the solvent recovery system was below the required 90.6%, by weight, for OCs.
2. If no deviations (excursions) occurred during a reporting period then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
2.9 lbs OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation may be determined as follows:

$$Ed = \{ [(Mp/2000 * 3.3) + (Mp/2000 * 0.00024)] * (1-Cf) \} * 24$$

Where:

Ed = daily OC emissions (lbs/day)

Mp = maximum hourly capacity, in pounds

Cf = the overall capture and control efficiency

- 1.b Emission Limitations:
58.3 tons OC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

180 tons OC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

V. Testing Requirements (continued)

- 1.c** Emission Limitation-
minimum overall control efficiency of 90.6% of OC, by weight

Applicable Compliance Methods-

The permittee shall demonstrate compliance with the control requirements above in accordance with the record keeping requirements specified in Sections A.III.1 of this permit.

- 2.** The permittee shall employ USEPA Method 24 or formulation data to determine the OC contents of all the materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Vulcan Toluene Decantering (P018)
Activity Description: Vulcan Toluene Decanter System

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vulcan toluene decanting w/ two condensers, decanter tank and associated piping/equipment	OAC rule 3745-31-05(A)(3) PTI #05-8246	4.7 lbs of organic compound (OC) emissions/day
	OAC rule 3745-21-07(G)(2)	See A.I.2.a and b. The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A) (3).

2. Additional Terms and Conditions

- 2.a The OC emissions (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) shall not exceed 58.3 tons per rolling, 30-day period and 180 tons per rolling, 365-day period.
- 2.b The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall OC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records and calculations that demonstrate ongoing compliance with the April 3, 1998 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol (copies of the letter and the agreement are attached to this permit).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) in accordance with the established requirements of the April 3, 1998 mass balance protocol agreement between the Ohio EPA and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol:
 - a. The rolling, 30-day summation of the calculated OC emissions, in tons.
 - b. The rolling, 365-day summation of the calculated OC emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the OC emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All exceedances of the rolling, 365-day OC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day OC emission limitation of 58.3 tons.
 - c. All records showing that the restriction on the rolling, 30-day average overall capture and control efficiency of the solvent recovery system was below the required 90.6%, by weight, for OCs.
2. If no deviations (excursions) occurred during a reporting period then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation:
4.7 lbs OC/day

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation may be determined as follows:

$$Ed = \{ [(Mp/2000 * 3.3) + (Mp/2000 * 0.00024)] * (1-Cf) \} * 24$$

Where:

Ed = daily OC emissions (lbs/day)

Mp = maximum hourly capacity, in pounds

Cf = the overall capture and control efficiency

- 1.b Emission Limitations:
58.3 tons OC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

180 tons OC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

V. Testing Requirements (continued)

- 1.c** Emission Limitation-
minimum overall control efficiency of 90.6% of OC, by weight

Applicable Compliance Methods-

The permittee shall demonstrate compliance with the control requirements above in accordance with the record keeping requirements specified in Sections A.III.1 of this permit.

- 2.** The permittee shall employ USEPA Method 24 or formulation data to determine the OC contents of all the materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Sealex Manufacturing (P019)

Activity Description: Sealex manufacturing consisting of solvent dispensers, mixing drums, tumbling machine, extruder, and solvent extraction oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Sealex manufacturing consisting of solvent dispensers, mixing drums, tumbling machine, extruders, solvent extraction oven, stretching machine, sintering oven, spool packaging and winding equipment	OAC rule 3745-31-05(A)(3) PTI #05-11991	500 lbs organic compounds (OC)/day 17.8 tons OC/yr, based upon a rolling, 12-month summation of the monthly solvent usage rates (see A.II.1) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	None, see A.II.2.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The maximum annual lubricant solvent usage rate (emissions*) for this emissions unit shall not exceed 17.8 tons, based upon a rolling, 12-month summation of the monthly lubricant solvent usage rates.

* it is assumed that all the solvent employed is emitted
- The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and maintain each month the following information for this emissions unit:
 - a. The company identification for each liquid organic material employed.
 - b. The number of gallons of each liquid organic material employed.
 - c. The OC content of each liquid organic material employed, in pounds per gallon.
 - d. The OC emissions for all the liquid organic materials employed [summation of (b x c) for all liquid organic materials, divided by 2000], in tons.
 - e. The rolling, 12-month summation for all the liquid organic materials employed, in tons.
 - f. The number of days the emissions unit was in operation.
 - g. The average daily OC emissions for all the liquid organic materials employed [(d/f) x 2000], in pounds (average).
 - h. Documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. An identification of each month during which the average daily OC emissions exceeded 500.00 pounds per day, and the actual OC emissions for each such day.
 - b. An identification of each month during which the rolling, 12-month OC emission limitation of 17.8 tons was exceeded.
2. If no deviations (excursions) occurred during a reporting period then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.
3. The permittee shall notify the Director (the Southwest District Office) in writing of any monthly record showing the use of any photochemically reactive material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Southwest District Office) within 30 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitations:
500 lbs OC/day
17.8 tons OC/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the daily and annual allowable OC emission limitations above shall be based on the record keeping requirements specified in section A.III.1 of this permit.
2. The permittee shall employ USEPA Method 24 or formulation data to determine the OC contents of all the materials.

Facility Name: **Thermoseal Inc.**
Facility ID: **05-75-01-0161**
Emissions Unit: **Sealex Manufacturing (P019)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Sealex manufacturing consisting of solvent dispensers, mixing drums, tumbling machine, extruders, solvent extraction oven, stretching machine, sintering oven, spool packaging and winding equipment	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Synthetic aliphatic hydrocarbons

TLV (ug/m3): 1,395,920

Maximum Hourly Emission Rate (lbs/hr): 41.67

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4742

MAGLC (ug/m3): 33,236.15

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters

II. Operational Restrictions (continued)

(e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

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

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

III. Monitoring and/or Record Keeping Requirements (continued)

2. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Planetary Mixing System (P020)
Activity Description: Mixer for production of start and finish deck mash

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Planetary mixing system, equipped with a solvent capture and recovery system	OAC rule 3745-31-05(A)(3) PTI #05-12092	1.94 lb particulate emissions (PE)/hr and 1.86 tons PE/yr
		0.26 lb volatile organic compounds (VOC)/hr and 0.12 ton VOC/yr (from mixing and mobile cleaning operations, combined)
		See A.I.2.a and b.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-07(G)(2)	The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The OC emissions (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) shall not exceed 58.3 tons per rolling, 30-day period and 180 tons per rolling, 365-day period.

2. Additional Terms and Conditions (continued)

- 2.b** The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall OC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records and calculations that demonstrate ongoing compliance with the April 3, 1998 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol (copies of the letter and the agreement are attached to this permit).

II. Operational Restrictions

1. The VOC content of the gasket mash produced by this emissions unit shall not exceed 45%, by weight, per batch.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that list the following information for this emissions unit:
- a. The company identification of the materials being mixed in each batch.
 - b. The amount, in pounds, of the materials being mixed in each batch.
 - c. The VOC content, in percent, by weight, of the materials being mixed.
2. The permittee shall collect and record the following information each day (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined) in accordance with the established requirements of the April 3, 1998 mass balance protocol agreement between the Ohio EPA and the permittee, and the June 7, 1999 Ohio EPA letter of approval of the mass balance protocol:
- a. The rolling, 30-day summation of the calculated OC emissions, in tons.
 - b. The rolling, 365-day summation of the calculated OC emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the OC emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
- a. All exceedances of the rolling, 365-day OC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day OC emission limitation of 58.3 tons.
 - c. All records showing that the restriction on the rolling, 30-day average overall capture and control efficiency of the solvent recovery system was below the required 90.6%, by weight, for OCs.
 - d. All exceedances of the VOC content limitation of 45%, by weight.
2. If no deviations (excursions) occurred during a reporting period then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation:

1.94 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case emissions rate for PE, the following equation may be used:

$$ER = (MASPH) \times UPE$$

where,

$$ER = PE \text{ rate (lbs/hr)}$$

MASPH = maximum amount of material per batch per hour (2,092 lbs/batch/hr)

UPE = uncontrolled PE [9.25 E -4 lb/lb of rubber]*

* the maximum value obtained from the draft AP-42 document, Section 4.12, Table 4.12-4, Internal Mixing and Milling Emission Factors for manufacture of Rubber Products

1.b Emission Limitation:

1.86 tons PE/yr

Applicable Compliance Method:

To determine the actual worst case emissions rate for PE, the following equation may be used:

$$AER = (MASPY) \times UPE$$

where,

$$AER = \text{annual PE rate (tons/year)}$$

MASPY = maximum amount of material per year (2008 tons/yr*)

UPE = uncontrolled PE [assume 9.25 E -4 lb/lb of rubber]**

* based on the maximum annual production rate (8 batches per day x 5 days per week x 48 weeks per year)

** the maximum value obtained from the draft AP-42 document, Section 4.12, Table 4.12-4, Internal Mixing and Milling Emission Factors for manufacture of Rubber Products

V. Testing Requirements (continued)

1.c Emission Limitation:

0.26 lb VOC/hr

Applicable Compliance Method:

Compliance with the hourly allowable VOC emissions rate above may be determined as follows:

$$ER = (MASPH) \times UVOC \times (1 - CE) + [(HSU) \times (CVOC) \times (EF)]$$

where,

ER = VOC emissions rate (lbs VOC/hr)

MASPH = maximum amount of material processed per batch per hour (2092 lbs/batch/hr)

UVOC = uncontrolled VOC emissions [4.44 E -4 lb VOC/lb of rubber]*

HSU = maximum hourly solvent usage rate (2.53 gallons/hr)

CVOC = maximum VOC content of the cleaning solvent (7.2 lbs VOC/gallon)

EF = 0.1 x (1 - CE)

CE = control efficiency (0.906)

* the maximum value obtained from the draft AP-42 document, Section 4.12, Table 4.12-4, Internal Mixing and Milling Emission Factors for manufacture of Rubber Products

V. Testing Requirements (continued)

1.d Emission Limitation:

0.12 ton of VOC / yr

Applicable Compliance Method:

Compliance with the annual allowable VOC emissions may be determined as follows:

$$\text{AER} = [(\text{MASPY} \times 2000) \times \text{UVOC} \times (1 - \text{CE}) + \{(\text{ASU}) \times (\text{CVOC}) \times (\text{EF})\}] \times \text{CONV}$$

where,

AER = annual VOC emissions rate (tons VOC/yr)

MASPY = maximum amount of material used per year (2008 tons material/yr)

UVOC = uncontrolled VOC [4.44 E -4 lb VOC/lb of rubber]*

ASU = maximum annual solvent usage rate (1200 gallons/yr)

CVOC = maximum VOC content of the cleaning solvent (7.2 lbs VOC/gallon)

EF = 0.10 x (1 - CE)

CE = control efficiency (0.906)

CONV = conversion factor (1 ton / 2000 lbs)

* based on the maximum annual production rate (8 batches per day x 5 days per week x 48 weeks per year)

** the maximum value obtained from the draft AP-42 document, Section 4.12, Table 4.12-4, Internal Mixing and Milling Emission Factors for manufacture of Rubber Products

1.e Emission Limitations:

58.3 tons OC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

180 tons OC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020, combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections A.III.2 of this permit.

1.f Emission Limitation-

minimum overall control efficiency of 90.6% of OC, by weight

Applicable Compliance Methods-

The permittee shall demonstrate compliance with the control requirements above in accordance with the record keeping requirements specified in Sections A.III.2 of this permit.

1.g Emission Limitation-

VOC content not to exceed 45%, by weight

Applicable Compliance Methods-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

V. Testing Requirements (continued)

1.h Emission Limitation-

Visible PE shall not exceed 20% opacity, as a six minute average, except as provided by rule.

Applicable Compliance Method-

If required, the permittee shall demonstrate compliance with the visible PE above in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- 2.** The permittee shall employ USEPA Method 24 or formulation data to determine the OC/VOC contents of all the materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

THIS IS THE LAST PAGE OF THE PERMIT
