



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
LAKE COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-21563

Fac ID: 0243081155

DATE: 1/31/2006

OSI Sealants
Larry Lepard
7405 Production Dr
Mentor, OH 44060

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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 within thirty (30) days after the notice of the Directors 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. 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

Sincerely,

Michael W. Ahern

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

CC: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 1/31/2006
Effective Date: 1/31/2006**

FINAL PERMIT TO INSTALL 02-21563

Application Number: 02-21563
Facility ID: 0243081155
Permit Fee: **\$500**
Name of Facility: OSI Sealants
Person to Contact: Larry Lepard
Address: 7405 Production Dr
Mentor, OH 44060

Location of proposed air contaminant source(s) [emissions unit(s)]:
**7405 Production Dr
Mentor, Ohio**

Description of proposed emissions unit(s):
6,000 gal. product storage tank.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - 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.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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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.

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.

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

permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- 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 ORC section 3704.08.
 - 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

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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.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

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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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

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3. 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.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

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

7. Applicability

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

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8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

C. Permit-To-Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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Ohio EPA Permit to Install Information Form

Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to Permitting, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electroni</u> <u>c</u>	<u>Additional information File</u> <u>Name Convention (your PTI</u> <u># plus this letter)</u>	<u>Hard</u> <u>Copy</u>	<u>Non</u> <u>e</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	000000c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	000000a.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	000000t.wpd	<input type="checkbox"/>	<input type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

This PTI is for a 6,000 gallon cap. holding/storage tank for finished adhesive material, the adhesive is held until packaged into tubes, cans or buckets. Material transfer will be enclosed into the permanently sealed tank, which will be nitrogen blanketed and exhausted through a condenser system air poll. control device.

The OSI Sealants facility has an effective Title V Permit and is major for HAPs. The new emissions unit will be subject to MACT rule Subpart HHHHH, the effective date for which is Dec 11, 2006. The proposed annual allowable OC emissions rate is 12.0 tpy, including 0.99 tpy of xylene (a HAP). No other major NSR rules are applicable.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **ENTER PTI NUMBER HERE**

- A. Source Description
- B. Facility Emissions and Attainment Status
- C. Source Emissions
- D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
Organic Compounds	12.0

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart HHHHH. The compliance date for this rule is December 11, 2006.
2. The final rules found in 40 CFR Part 63, Subpart HHHHH establish emission limits and work practice standards and compliance requirements for miscellaneous coating manufacturing, wastewater and conveyance systems, transfer operations, storage tanks, and ancillary equipment associated with coating manufacturing. The following adhesive/sealants mixer systems and associated storage tanks are subject to this subpart: P001, P002, P003, P005, P011, P012, P014, P015, P017, T001, T002, T008, T013, T014, T015, T016, T017, Z002, Z003, Z004, Z005, Z006, Z007, Z008, Z009, Z010, Z011, and Z012, including chemical transfer and loading to and from the tanks and the mixer systems.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P018 - 6,000 Gallon Holding Tank (TK-59) for finished adhesives products, with a vacuum system and control equipment consisting of a permanent totally enclosed (sealed cover) vessel, nitrogen blanket and condenser system.	OAC rule 3745-21-07 (G)(2)	The emission limitation specified by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-31-05 (A)(3)	Organic compound emissions from this emissions unit shall be reduced by at least eighty-five per cent (85%), by weight, as an overall control efficiency.
	40 CFR Part 63, subpart HHHHH	See section A.I.2.a of these terms and conditions.
		Organic compound emissions, including OC emissions from cleanup materials, from this emissions units shall not exceed 2.73 pounds per hour and 12.0 tons per year.
		See section A.I.2.b of these terms and conditions.

2. Additional Terms and Conditions

- 2.a OAC rule 3745-21-07 (G)(2) limits organic compound (OC) emissions to 8 pounds per hour and 40 pounds per day or requires an 85% overall reduction in OC emissions. An OC control system, that includes an enclosed mixer, a nitrogen blanket, and a condenser, is employed to comply with the requirement to achieve an 85% overall reduction in OC emissions, instead of complying with

the OC emission limits of 8 pounds per hour and 40 pounds per day.

- 2.b The permittee shall comply with all the emission limits, work practice standards, as well as other requirements established in 40 CFR Part 63, Subpart HHHHH no later than December 11, 2006.

II. Operational Restrictions

1. The average temperature of the exhaust gases from the condenser, for any eight 3-hour blocks of time during the day, shall not be more than 106 degrees Fahrenheit, which is the temperature calculated to maintain a minimum of 85% control efficiency, based on the equations and procedures in 40 CFR, Part 63, Section 63.1257(D)(2) and (3). This demonstration shall also serve to demonstrate compliance with the operating limits required in 40 CFR, Part 63, Section 63.8005(e) and (f).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be plus or minus 1 percent of the temperature being measured or plus or minus 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the requirements of 40 CFR, Part 63, Section 63.8005(a).
2. The permittee shall collect and record the following information for each day:
 - a. The average temperature of the exhaust gases from the condenser during each of the eight 3-hour blocks of time during the day.
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - c. For the temperature monitor, records of each calibration, maintenance performed and monitoring system malfunction per 40 CFR, Part 63, Section 63.8080(d). This condition shall become effective on Dec. 11, 2006.

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Emissions Unit ID: P018

3. The permittee shall use a flow indicator to subtract periods of no flow from the condenser temperature averages in accordance with 40 CFR, Part 63, Section 63.8005(g). This condition shall become effective on Dec. 11, 2006.
4. The permittee shall implement an initial and annual inspection of the closed vent system in accordance with 40 CFR, Part 63, Section 63.983. This condition shall become effective on Dec. 11, 2006.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all 3-hour periods of operation during which the average temperature of exhaust gases from the condenser (when there was flow through the condenser) was above the average temperature used in the condenser design evaluation, in accordance with 40 CFR, Part 63, Section 63.1257(d).
2. All deviation (excursion) reports shall be submitted in accordance with section A.1.c of the General Terms and Conditions.
3. The permittee shall submit quarterly reports which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
4. The permittee shall submit all of the notifications in 40 CFR, Part 63, Sections 63.6(h)(4) and (5), 63.7 (b) and (c), 63.8 (e), (f)(4) and (6), and 63.9 (b) through (h) that apply and by the dates as specified by rule.

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
 - a. 2.73 pounds per hour of OC emissions

Applicable Compliance Method:
Compliance shall be determined in accordance with the test methods and procedures in section A.V.2 of these terms and conditions.
 - b. Emission Limitation:
85% overall control efficiency of OC emissions

Applicable Compliance Method:
Compliance shall be determined in accordance with the test methods and procedures in section A.V.2 of these terms and conditions.
 - c. Emission Limitation:

12.0 tons per year of OC emissions

Applicable Compliance Method:

The tons per year limitations were developed by multiplying the pounds per hour limitations by the maximum operating schedule of 8,760 hours per year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

2. The permittee shall conduct a condenser design evaluation in accordance with the equations and procedures in 40 CFR, Part 63, Section 63.1257(d) in lieu of emissions testing for this emissions unit.
 - a. The control efficiency (i.e.. the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the procedures specified in 40 CFR, Part 63, Section 63.1257(d)(2) and (3).
 - b. The condenser design evaluation shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P018 - 6,000 Gallon Holding Tank	None.	None.

2. Additional Terms and Conditions

2.a

II. Operational Restrictions

III. Monitoring and/or Recordkeeping Requirements

IV. Reporting Requirements

V. Testing Requirements

VI. Miscellaneous Requirements

NEW SOURCE REVIEW FORM B

PTI Number: 02-21563 Facility ID: 0243081155
 FACILITY NAME OSI Sealants
 FACILITY DESCRIPTION 6,000 gal. product storage tank. CITY/TWP Mentor
 SIC CODE 2891 SCC CODE EMISSIONS UNIT ID P018
 EMISSIONS UNIT DESCRIPTION 6,000 Gallon Holding Tank for finished adhesive materials
 DATE INSTALLED Upon PTI issuance in 2006.

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		2.7 lbs/hour	12.0	2.7 lbs/hour	12.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP/ MACT Subpart PSD? OFFSET POLICY?
 HHHHH, eff. date
 12/11/06.

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination: Use of an permanent totally enclosed tank, nitrogen blanket and exhausted thru a condenser system.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ info not available

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: Organic Compounds