



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
LORAIN COUNTY  
Application No: 02-13130**

**CERTIFIED MAIL**

**DATE: 3/6/2001**

BF Goodrich Company - Avon Lake Plant  
John Uptmor  
550 Moore Rd  
Avon Lake, OH 44012-0134

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

NEDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 02-13130**

Application Number: 02-13130  
APS Premise Number: 0247030004  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: BF Goodrich Company - Avon Lake Plant  
Person to Contact: John Uptmor  
Address: 550 Moore Rd  
Avon Lake, OH 44012-0134

Location of proposed air contaminant source(s) [emissions unit(s)]:

**550 Moore Rd  
Avon Lake, Ohio**

Description of proposed emissions unit(s):

**Production of acrylic polymers.**

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

**BF Goodrich Company - Avon Lake Plant**

**Facility ID: 0247030004**

**PTI Application: 02-13130**

**Issued: To be entered upon final issuance**

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

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

#### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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 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.)

#### **3. 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.

#### **4. 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

**BF Goodrich Company - Avon Lake Plant**

**Facility ID: 0247030004**

**PTI Application: 02-13130**

**Issued: To be entered upon final issuance**

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.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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).

**6. 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.

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install 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.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

**BF Goodrich Company - Avon Lake Plant**

**Facility ID: 0247030004**

**PTI Application: 02-13130**

**Issued: To be entered upon final issuance**

lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional

**BF Goodrich Company - Avon Lake Plant**

**Facility ID: 0247030004**

**PTI Application: 02-13130**

**Issued: To be entered upon final issuance**

facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

**10. 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.

**11. 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).

**12. 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.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

- 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

**BF Goodrich Company - Avon Lake Plant**

**Facility ID: 0247030004**

**PTI Application: 02-13130**

**Issued: To be entered upon final issuance**

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 To Install 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

#### **14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

#### **15. 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 this Permit to Install.

### **B. 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.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Organic Compounds	15.5
Particulate Emissions	0.8
HAPs	1.16

## Issue

Emissions Unit ID: P007

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

- 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>
P007 - Modification to the existing specialty additives process unit located in Building 437, for the production of acrylic polymers	OAC rule 3745-31-05 (A)(3)	Visible particulate stack emissions shall not exceed 10 percent opacity as a six-minute average.  OC: 3.54 pounds/hour and 15.5 tons/year.
Organic compound control equipment: Thermal Oxidizer at Egress Point No. 9; Condenser at Egress Point No. 21; Scrubber at Egress Point No. 37; and Scrubber/Condenser tandem at Egress Point No. 44.	OAC rule 3745-21-07(G)(2)	PM: 0.18 pounds/hour and 0.8 tons/year.  Emissions of organic compounds from this emissions unit, shall be reduced by at least 85 percent.
Particulate Matter control equipment: Baghouse at Egress Point No. 46; Baghouse at Egress Point No. 61; and System Filter at Egress Point No. 68.	OAC rule 3745-17-07(A)  OAC rule 3745-17-11(B)	Exempt, because emissions unit is not located within an Appendix A area.  Less stringent than limit established pursuant to OAC rule 3745-31-05.
Organic Compound Uncontrolled Egress Points: 1, 5, 6, 8, 14, 15, 16, 20, 22, 23, 24, 32, 33, 34, 35, 36, 38, 41, 42, 43, 45, 48, 49, 50, 55, 58, 59, 60, 62, 63, 67.	OAC rule 3745-31-05  OAC rule 3745-31-05	Compliance with the Air Toxics Policy.  HAP's: 0.26 pounds/hour and 1.16 tons/year.

**2. Additional Terms and Conditions**

**BF Goodrich Company - Avon Lake Plant**

**PTI Application 02-12120**

**Issue**

**Facility ID: 0247030004**

**Emissions Unit ID: P007**

**2.a** None

**BFG****PTI**Emissions Unit ID: **P007****Issued: To be entered upon final issuance****B. Operational Restrictions**

1. The average thermal oxidizer Zone 1 temperature from the thermal incinerator (egress point no. 9), for any 3-hour block of time, shall not be less than 1350 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent test that demonstrated the emissions unit was in compliance.
2. The pressure drop across both baghouses (egress point nos. 46, 61, and 68) shall be maintained within the range of 0.4 - 6 inches of water while the emissions unit is in operation.
3. The average temperature of the exhaust gases from the scrubber-condenser (egress point no. 44), for any 3-hour block of time, shall not be more than 11 degrees Fahrenheit above the average temperature during the most recent test that demonstrated the emissions unit was in compliance.
4. The average temperature of the exhaust gases from the condenser (egress point no. 21), for any 3-hour block of time, shall not be more than 11 degrees Fahrenheit above the average temperature during the most recent test that demonstrated the emissions unit was in compliance.
5. The pH of the scrubber (egress point no. 37) liquor shall be maintained in the range of 6.0 - 8.0.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within Zone 1 of the thermal incinerator (egress point no. 9) when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information each day:
  - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator (egress point no. 9), when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

## Issue

Emissions Unit ID: P007

3. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across all baghouses (egress point nos. 46, 61, and 68) while the emissions unit is in operation. The monitoring equipment shall be installed, 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 baghouses on a daily basis.
4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the scrubber-condenser (egress point no. 44) 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 within 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 manufacturer's recommendations, instructions and operating manuals.
5. 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 (egress point no. 21) 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 within 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 manufacturer's recommendations, instructions and operating manuals.
6. The permittee shall collect and record the following information each day:
  - a. The average temperature of the exhaust gases from the scrubber-condenser (egress point no. 44) during each of the eight 3-hour blocks of time during the day; and,
  - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
7. The permittee shall collect and record the following information each day:
  - a. The average temperature of the exhaust gases from the condenser (egress point no. 21) during each of the eight 3-hour blocks of time during the day; and,
  - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
8. The permittee shall collect and record the following information each day:

**BF Goodrich Company - Avon Lake Plant**

**Facility ID: 0247030004**

**PTI Application 02-12-20**

**Issue**

Emissions Unit ID: **P007**

- a. The pH of the scrubber (egress point no. 37) liquor, on a daily basis.
  - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
9. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.
10. 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.
11. The emissions unit's monthly hours of operation.
12. This permit allows the use of 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: Ammonia

TLV (ug/m3): 17000

Maximum Hourly Emission Rate (lbs/hr): 0.54

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.287

**BF G****PTI /****Issued: To be entered upon final issuance**Emissions Unit ID: **P007**

MAGLC (ug/m3): 404

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;

BF G

PTI /

Emissions Unit ID: P007

**Issued: To be entered upon final issuance**

- b. changes to the emissions unit or its exhaust parameters (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.

#### **D. Reporting Requirements**

1. 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 Ohio EPA Northeast District Office.
  - b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from 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, (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 Northeast District Office of the Ohio EPA. If no deviations occurred during the 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. The permittee shall submit semi-annual deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator (egress point no. 9) does not comply with the temperature limitation specified above.
3. The permittee shall submit semi-annual pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across any baghouses (egress point nos. 46, 61 and 68) did not comply with the allowable range specified above.
4. The permittee shall submit semi-annual temperature (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the scrubber-condenser (egress point no. 44) exceeded the temperature limitation specified above.
5. The permittee shall submit semi-annual temperature (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the scrubber-condenser (egress point no. 21) exceeded the temperature limitation specified above.
6. The permittee shall submit pH deviation (excursion) reports that identify all periods of time during which the scrubber (egress point no. 37) liquor pH did not comply with the pH requirements specified above

#### **E. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 90 days of issuance of this permit to install.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for organic compounds and to demonstrate that all organic compound emissions from this emissions unit are reduced by at least 85 percent.
  - c. The following test method(s) shall be employed to demonstrate compliance with the

BF G

PTI /

Emissions Unit ID: P007

**Issued: To be entered upon final issuance**

allowable mass emission rate(s) and to demonstrate at least 85 percent reduction in organic compound emissions: Method 25 or 25A of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

2. Compliance with the emission limitations above shall be determined in accordance with the following methods:

Emission Limitation: 85 percent reduction of organic compounds.

Applicable Compliance Method: Percent reduction shall be calculated by comparing the amount of organic compounds entering all of the control equipment with the amount of organic compounds exiting all of the control equipment. The egress points that need to show compliance with this limitation are as follows 9, 21,37, and 44. The amount of organic compounds in both gas streams shall be determined by using one of the following method(s) : Method 25 or 25A of 40 CFR Part 60, Appendix A.

**BF Goodrich Company - Avon Lake Plant**

**PTI A-111111-02-12120**

**Issue**

**Facility ID: 0247030004**

Emissions Unit ID: **P007**

Emission Limitation: 3.54 pounds of Organic Compounds per hour.

Applicable Compliance Method: This emission limitation shall apply to the summation of controlled and uncontrolled organic compound emissions. Controlled organic emissions shall be determined by Method 25 or 25A of 40 CFR Part 60, Appendix A. Uncontrolled emissions shall be determined by mass balance calculations provided by the facility.

Emission Limitation: 15.5 tons of Organic Compounds per year.

Applicable Compliance Method: This emission limitation shall apply to the summation of controlled and uncontrolled organic compound emissions. Controlled organic compound emissions shall be determined by multiplying the hourly emission rate (established by the initial compliance test or most recent compliance test) by the emission units hours of operation and then dividing by 2000 (pounds per ton). Uncontrolled organic compound emissions shall be determined by mass balance calculations supplied by the facility.

Emission Limitation: 0.18 pounds of Particulate Matter per hour.

Applicable Compliance Method: Particulate Matter emissions shall be determined in accordance with the following method, if required: Method 5 of 40 CFR, Part 60, Appendix A. Emissions are based on maximum facility operation.

Emission Limitation: 0.8 tons of Particulate Matter per year.

Applicable Compliance Method: Annual Particulate Matter emissions shall be determined by multiplying pounds of particulate matter per hour (determined by the most recent compliance test, if required) by hours of operation and dividing by 2000 (pounds per ton).

Emission Limitation: Visible particulate stack emissions shall not exceed 10 percent opacity as a 6-minute average.

Applicable Compliance Method: Compliance with the visible emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

Emission Limitation: 0.26 pounds of Hazardous Air Pollutants per hour

Applicable Compliance Method: This emission limitation shall apply to the summation of controlled and uncontrolled hazardous air pollutant (HAP) emissions. Controlled HAP emissions shall be determined in accordance with Method 18 of 40 CFR, Part 60, Appendix A or equivalent method, if required. Uncontrolled HAP emissions shall be

**BF Goodrich Company - Avon Lake Plant**

**Facility ID: 0247030004**

**PTI Limitation 02-12-20**

**Issue**

Emissions Unit ID: **P007**

based on material balance calculations and facilities knowledge of operations.

Emission Limitation: 1.16 tons of Hazardous Air Pollutants per year.

**BF G****PTI /****Issued: To be entered upon final issuance**Emissions Unit ID: **P007**

Applicable Compliance Method: This emission limitation shall apply to the summation of controlled and uncontrolled hazardous air pollutant (HAP) emissions. Controlled HAP emissions shall be determined by multiplying the hourly emission rate (established by the most recent compliance test, or material balance calculation) by the emission units hours of operation and then dividing by 2000 (pounds per ton). Uncontrolled HAP emissions shall be determined by material balance calculations supplied by the facility.

**F. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13130 Facility ID: 0247030004

FACILITY NAME BF Goodrich Company - Avon Lake Plant

FACILITY DESCRIPTION Production of acrylic polymers CITY/TWP Avon Lake

SIC CODE 2821 SCC CODE 3-01-018-22 EMISSIONS UNIT ID P007

EMISSIONS UNIT DESCRIPTION Modification to the existing specialty additives process unit located in Building 437, for the production of acrylic polymers

DATE INSTALLED 6/98

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	attainment		0.18	0.18	0.8
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment		3.54	3.54	15.5
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	ammonia		0.54	0.54	2.37

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**Enter Determination:** Visible emissions shall not exceed 10% opacity as a 6 minute average, compliance with the air toxics policy, Compliance with OAC rule 3745-21-07(G)(2) for 85% , by weight, emission reduction via control devices. There are over 50 egress points. The most significant emission points: 9,21,37, and 44 are controlled. See attached Table 1 (3 pages)

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ 400 M over the last 15 years

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? X YES        NOIDENTIFY THE AIR CONTAMINANTS: Ammonia

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13130 Facility ID: 0247030004

FACILITY NAME BF Goodrich Company - Avon Lake Plant

FACILITY DESCRIPTION Production of acrylic polymers CITY/TWP Avon Lake

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 Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to [airpti@epa.state.oh.us](mailto:airpti@epa.state.oh.us)

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

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.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 facility is a chemical plant. Due to increases in technology, production has increased for this emissions unit. The facility is requesting that this permit to install be issued draft.

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**  
Pollutant Tons Per Year

**NEW SOURCE REVIEW FORM B**

PTI Number: 02-13130

Facility ID: 0247030004

FACILITY NAME BF Goodrich Company - Avon Lake Plant

FACILITY DESCRIPTION	Production of acrylic polymers	CITY/TWP	Avon Lake
<b>Organic Compounds</b>		<b>15.5</b>	
<b>Particulate Emissions</b>		<b>0.8</b>	
<b>HAPs</b>		<b>1.16</b>	