



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
LORAIN COUNTY
Application No: 02-14401**

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 02-14401

Application Number: 02-14401
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):

Modification to the Graphic Arts Process (P026).

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: 02-14401

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

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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

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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

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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

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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	1.45
Particulate Emissions	0.39

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>
Modification to Graphic Arts Operations located in building 434.	OAC rule 3745-31-05(A)(3)	Visible particulate stack emissions shall not exceed 10 percent opacity as a six-minute average.
Organic compound control equipment: Ketema vacuum jet condenser (CN-4F) at egress point no. 2; Industrial Process Equipment vent condenser (CN-1F) at egress point no. 3; Lucas scrubber (TK-2G) at egress point no. 5.		Organic Compound emissions shall not exceed 0.33 pounds per hour and 1.45 tons per year.
Particulate emissions control equipment: Mikropul dust collector (BH-2H) at egress point no. 9.	OAC rule 3745-21-07(G)(2)	Particulate emissions shall not exceed 0.09 pounds per hour and 0.39 tons per year.
	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)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
		Exempt, because the emissions unit is not located within an Appendix A area.

2. Additional Terms and Conditions**2.a** None**B. Operational Restrictions**

1. The water flow rate into the vacuum jet condenser (CN-4F) at egress point no. 2, shall not be less than 12 gallons per minute.
2. The average temperature of the coolant from the vent condenser (CN-1F) at egress point no. 3, shall not be greater than 40 degrees Fahrenheit.
3. The scrubber (TK-2G) at egress point no. 5, water flow rate shall be continuously maintained at a value of not less than 3 gallons per minute at all times the emissions unit is in operation.
4. The pressure drop across the scrubber (TK-2G) at egress point no. 5, shall be continuously maintained at a range of 0.4 - 6 inches of water at all times while the emissions unit is in operation.
5. The pressure drop across the baghouse (BH-2H) at egress point no. 9, shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day:
 - a. The water flow rate into the vacuum jet condenser (CN-4F), egress point no. 2 once every shift.
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall collect and record the following information each day:
 - a. The average temperature of the coolant from the vent condenser (CN-1F), egress point no. 3, once every shift.
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

Issue

Emissions Unit ID: P026

3. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber (TK-2G) at egress point no. 5 and the scrubber (TK-2G) water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
4. The permittee shall collect and record the following information each day:
 - a. The pressure drop across the scrubber (TK-2G), in inches of water, on a once per shift basis.
 - b. The scrubber (TK-2G) water flow rate, in gallons per minute, on a once per shift basis.
 - c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
5. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse (BH-2H) at egress point no. 9 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 (BH-2H) on a once per shift basis.

D. Reporting Requirements

1. The permittee shall submit flow rate deviation (excursion) reports that identify all times during which the flow rate of the water coolant into the vacuum jet condenser (CN-4F) at egress point no. 2 exceeded the flow rate limitation specified above.
2. The permittee shall submit temperature deviation (excursion) reports that identify all times during which the temperature of the coolant into the vent condenser (CN-1F) at egress point no. 3 exceeded the temperature limitation specified above.
3. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber (TK-2G) parameters at egress point no. 5 were not maintained at or above the required levels:
 - a. The static pressure drop across the scrubber (TK-2G).
 - b. The scrubber (TK-2G) flow rate.
4. The permittee shall submit pressure drop deviation (excursion) reports that identify that all

BFG**PTI**Emissions Unit ID: **P026****Issued: To be entered upon final issuance**

periods of time during which the pressure drop across the baghouse (BH-2H) at egress point no. 9 did not comply with the allowable range specified above.

E. Testing Requirements

1. Emission Limitation: Visible particulate stack emissions shall not exceed 10 percent opacity as a six-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.

2. Emission Limitation: Organic Compound emissions shall not exceed 0.33 pounds per hour.

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

3. Emission Limitation: Organic Compound emissions shall not exceed 1.45 tons per year.

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

4. Emission Limitation: Particulate emissions shall not exceed 0.09 pounds per hour.

Applicable Compliance Method: Particulate emissions shall be determined in accordance with the following method, if required: Method 5 of 40 CFR, Part 60, Appendix A and/or mass balance calculations provided by the facility. Emissions are based on maximum facility operation.

5. Emission Limitation: Particulate emissions shall not exceed 0.39 tons per year.

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

F. Miscellaneous Requirements

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BF Goodrich Company - Avon Lake Plant

PTI Application 02-14401

Issue

Facility ID: 0247030004

Emissions Unit ID: P026

None

NEW SOURCE REVIEW FORM B

PTI Number: 02-14401 Facility ID: 0247030004

FACILITY NAME BF Goodrich Company - Avon Lake Plant

FACILITY DESCRIPTION Modification to the Graphic Arts Process CITY/TWP Avon Lake
(P026)

SIC CODE 2821 SCC CODE 3-01-132-21 EMISSIONS UNIT ID P026

EMISSIONS UNIT DESCRIPTION Modification to Graphic Arts Operations located in building 434.

DATE INSTALLED 6/94 last issued PTI

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	0.09	0.35	0.09 lb/hr	0.39
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	0.33	1.29	0.33 lb/hr	1.45
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

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 from the stack shall not exceed 10 percent as a six-minute average. Compliance with the allowable mass emissions rate.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ NA

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*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 02-14401 Facility ID: 0247030004

FACILITY NAME BF Goodrich Company - Avon Lake Plant

FACILITY DESCRIPTION Modification to the Graphic Arts Process CITY/TWP Avon Lake
(P026)

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**

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 type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" 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

The facility would like to have this issued Draft. The potential to emit from the facility is well below Title 5 levels. Chemical plants are continuously changing formulations and tweaking their processes. BF Goodrich wants to ensure that their potential emissions are below Title 5 levels and they believe that having permits that are issued draft help guarantee this goal.

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:

NEW SOURCE REVIEW FORM B

PTI Number: 02-14401 Facility ID: 0247030004

FACILITY NAME BF Goodrich Company - Avon Lake Plant

FACILITY DESCRIPTION	Modification to the Graphic Arts Process (P026)	CITY/TWP	Avon Lake
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SUMMARY (for informational purposes only)**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
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Particulate Emissions	0.39