Facility ID: 0285000406 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

Go to Part II for Emissions Unit R001
Go to Part II for Emissions Unit R002

***THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION***

**Facility ID: 0285000406 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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

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

   (a) None.

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

   (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| R001 - Dip spinner for cleaning plastic parts with solvent (TECSOL) | OAC rule 3745-31-05(A)(3)<br>PTI No.: 02-14950 | 4.21 pounds OC per hour.<br><br>101 pounds per day and 18.47 tons per year OC |
| | OAC rule 3745-21-07(G)(2) | Exempt from these emission limitations per OAC 3745-21-09(G)(9)(f)<br><br>See B.1. |

2. **Additional Terms and Conditions**

   (a) None

B. **Operational Restrictions**

1. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

   Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA, Northeast District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day for the cleaning operation:

   a. The company identification for each solvent and cleanup material employed and documentation as to whether or not each solvent and cleanup material is a photochemically reactive material.

   b. The number of gallons of each solvent and cleanup material employed.

   c. The organic compound content of each solvent and cleanup material, in pounds per gallon.

   d. The total organic compound emission rate for all solvents and cleanup materials, in pounds per day.

   e. The total number of hours the emissions unit was in operation.

   f. The average hourly organic compound emission rate for all solvents and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

2. The permit to install for this emissions unit (R001) was evaluated based on the actual materials (solvents and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-

hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (mg/m3): 1880

Maximum Hourly Emission Rate (lbs/hr): 3.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5929

Predicted 1-Hour Maximum Ground-Level Concentration, sum for Methanol of R001 and R002, combined (ug/m3): 10513

MAGLC (ug/m3): 44762

Pollutant: Methanol

TLV (mg/m3): 262

Maximum Hourly Emission Rate (lbs/hr): 0.21

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 327.3

Predicted 1-Hour Maximum Ground-Level Concentration, sum for Methanol of R001 and R002, combined (ug/m3): 2177.3

MAGLC (ug/m3): 6238

Pollutant: Methylisobutylketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 0.0421

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 65.56

MAGLC (ug/m3): 4881

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

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

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

4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. **Reporting Requirements**

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any monthly record showing the use of noncomplying solvents and/or cleanup materials (i.e., photochemically reactive materials). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office ) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

   a. An identification of each day during which the average hourly total organic compound emissions exceeded 4.21 pounds per hour, and the actual average hourly organic compound emissions for each such day.

b. An identification of each day during which the total organic compound emissions exceeded 101 pounds per day, and the actual organic compound emissions for each such day.

3. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

E. **Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
4.21 pounds OC per hour

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.1. USEPA Method 24 or formulation data shall be used to determine the OC contents of the solvents and cleanup materials employed.

b. Emission Limitation :
101 pounds of OC per day

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.

c. Emission Limitation:
18.47 tons per year OC

Applicable Compliance Method:
Compliance shall be based upon the summation of daily emission rates recorded pursuant to Section C.1.

F. **Miscellaneous Requirements**

1. None



**Facility ID: 0285000406 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

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

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

(a) None.

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

(a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| R002 - Dip spinner used to apply adhesive coating | OAC rule 3745-31-05(A)(3)<br>PTI No.: 02-16372 | For the days when no photochemically reactive materials are employed:<br>4.27 pounds OC per hour<br><br>102.5 pounds per day and 18.7 tons per year OC (See 2.a.)<br><br>For those days when one or more photochemically reactive materials are employed:<br>7.3 tons per year OC<br><br>Organic compound (OC) emissions shall not exceed 8 pounds per hour, 40 pounds per day (See 2.b.) |
| | OAC rule 3745-21-07(G)(2) | |

2. **Additional Terms and Conditions**

(a) Except for the 7.3 tons per year limitation for OC, the emission limitations established pursuant to OAC rule 3745-31-05(A)(3) are applicable for those days when no photochemically reactive material is employed (coating and/or cleanup material). In the permit application, the permitee identified Chemlok y-1540 as a nonphotochemically reactive material.
This emission limitations specified in OAC rule 3745-21-07(G)(2) are applicable for those days when a photochemically reactive material is employed (coating and/or cleanup material). In the permit application, the permitee identified Xylene/Permaflex as a photochemically reactive material.

B. **Operational Restrictions**

1. None

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:

a. The company identification for each coating and cleanup material employed.

b. The number of gallons of each coating and cleanup material employed.

c. The organic compound content of each coating and cleanup material employed, in pounds per gallon.

d. An identification of whether or not each coating and cleanup material is a photochemically reactive material.

e. The total organic compound emission rate for all coatings and cleanup materials employed, in pounds.

f. The total number of hours the emissions unit was in operation.

g. The average hourly organic compound emission rate for all coatings and cleanup materials employed, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permit to install for this emissions unit (R002) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (mg/m3): 1880

Maximum Hourly Emission Rate (lbs/hr): 2.90

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4584

Predicted 1-Hour Maximum Ground-Level Concentration, sum for Methanol of R001 and R002, combined (ug/m3): 10230

MAGLC (ug/m3): 44762

Pollutant: Methanol

TLV (mg/m3): 262

Maximum Hourly Emission Rate (lbs/hr): 1.19

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1850

Predicted 1-Hour Maximum Ground-Level Concentration, sum for Methanol of R001 and R002, combined (ug/m3): 2161.7

MAGLC (ug/m3): 6238

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 1.45

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3729

MAGLC (ug/m3): 10,300

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically 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 previously modeled;

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

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

4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. For the days during which no photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 4.27 pounds per hour, and the actual, average hourly OC emissions for each such day.

b. For the days during which no photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 102.5 pounds per day, and the actual OC emissions for each such day.

c. For the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual, average hourly OC emissions for each such day.

d. For the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

2. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

E. **Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
4.27 pounds OC per hour

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.1. USEPA Method 24 or formulation data shall be used to determine the OC contents of the coatings and cleanup materials employed.

b. Emission Limitation :
102.5 pounds of OC per day

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.

c. Emission Limitation:
18.7 tons per year OC

Applicable Compliance Method:
Compliance shall be based upon the summation of daily emission rates documented pursuant to Section C.1.
d. Emission Limitation:
8 pounds OC per hour

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.1. USEPA Method 24 or formulation data shall be used to determine the OC contents of the coatings and cleanup materials employed.

e. Emission Limitation :
40 pounds of OC per day

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.1.

f. Emission Limitation:
7.3 tons per year OC

Applicable Compliance Method:
Compliance shall be based upon the summation of daily emission rates documented pursuant to Section C.1.

F. **Miscellaneous Requirements**

1. None