

6/6/2012

Certified Mail

Bill Kern  
Henkel Consumer Adhesives, Inc.  
7405 Production Drive  
Mentor, OH 44060

Facility ID: 0243081155  
Permit Number: P0084959  
County: Lake

RE: DRAFT AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Lake County News-Herald. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

*Michael W. Ahern*  
Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 -Via E-Mail Notification  
Ohio EPA-NEDO; Pennsylvania



PUBLIC NOTICE  
6/6/2012 Issuance of Draft Air Pollution Title V Permit

Henkel Consumer Adhesives, Inc.

7405 Production Drive,

Mentor, OH 44060

Lake County

FACILITY DESC.: Adhesive Manufacturing

PERMIT #: P0084959

PERMIT TYPE: Renewal

PERMIT DESC: Title V Renewal permit for adhesives and sealants manufacturing facility.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kenneth Djukic, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171





## Statement of Basis For Air Pollution Title V Permit

Facility ID:	0243081155
Facility Name:	Henkel Consumer Adhesives, Inc.
Facility Description:	Sealant manufacturer
Facility Address:	7405 Production Drive, Mentor, OH 44060
Permit #:	P0084959, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input type="checkbox"/> Maximum Available Control Technology Standard(s)	

### A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes.
Were there any [common control] issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No.
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

**B. Facility-Wide Terms and Conditions**

Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745- )	Other	
B.2		Subpart HH HH H of 40 CF R Par t 63	This facility subject to Subpart HHHHH LDAR requirements as an existing affected source.
B.3	77-07(A)		List of insignificant emissions units that are 'deminimis' sources.
B.4	77-07(A)		List of insignificant emissions units that have applicable requirements.

**C. Emissions Unit Terms and Conditions**

<p><b>Key:</b> EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements</p>	<p>ENF = did noncompliance issues drive the monitoring requirements? R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) Misc = miscellaneous requirements</p>
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St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745- )	Other												
P005	Visible emissions limited to 20%, except as provided by rule.	17-07(A)		N	N	Y	N	N	Y	N	Y	N	N		
	PE from stack limited to 5.38 lbs/hr.	17-11		N	N	Y	N	N	Y	N	Y	N	N		
	OC emissions limited to 10.0 tons/year and see comment field.	31-05(A)		N	N	Y	N	N	Y	N	Y	N	N		Combined OC emissions from P001, P002, P003 & P005, T001 and T002, shall not exceed 100 tons per yr, as a rolling 12-mos summation.
		Subpart HHHHH of Part 63		Y	N	N	N	N	N	N	N	N	N		ND - This emissions unit is not subject to this rule because the portable batch tanks used are of less than 250 gallons capacity, and therefore, do not meet the 'process vessel' definition in Section 63.8105 for applicability.
P011	Visible emissions limited to 20%,	17-07(A)		N	N	Y	N	N	Y	N	Y	N	N		



	except as provided by rule														
	PE from stack limited to 3.11 lbs/hr.	17-11		N	N	Y	N	N	Y	N	Y	N	N		
		Subpart HHHHH of Part 63		Y	N	N	N	N	N	N	N	N	N		ND - This emissions unit is not subject to this rule because the portable batch tanks used are of less than 250 gallons capacity, and therefore, do not meet the 'process vessel' definition in Section 63.8105 for applicability.
P012	Visible emissions limited to 20%, except as provided by rule.	17-07(A)		N	N	Y	N	N	Y	N	Y	N	N		
	PE from stack limited to 7.41 lbs/hr.	17-11		N	N	Y	N	N	Y	N	Y	N	N		
	See comment field.	Subpart HHHHH of Part 63		N	Y	Y	N	N	Y	N	Y	N	N		Subpart HHHHH requires the process vessel be equipped w/lid whenever it contains a HAP & overall capture/control of 75%, by wt., or greater, of HAPs emissions.



	OC emissions must be controlled, overall, by 85%, by wt.	21-07(M)		N	Y	Y	N	N	Y	N	Y	N	N		
	No visible emissions from the stack.	31-05(A)		N	N	Y	N	N	Y	N	Y	N	N		
P015	See comment field.	Subpart HHHHH of Part 63		N	Y	Y	N	N	Y	N	Y	N	N		Subpart HHHHH requires the process vessel be equipped w/lid or cover whenever it contains a HAP & overall capture/control of 75%, by wt., or greater, of HAPs emissions.
	OC emissions limited to 8.0 lbs/hr & 35.0 tpy.	31-05(A)		N	Y	Y	N	N	Y	N	Y	N	N		
	OC emissions must be controlled, overall, by 85%, by wt.	21-07(M)		N	Y	Y	N	N	Y	N	Y	N	N		
P017	See comment field.	17-07(A)		N	N	Y	N	N	Y	N	Y	N	N		The requirements of this rule are less stringent than those established as BAT under rule 3745-31-05(A).
	See comment field.	17-11		N	N	Y	N	N	Y	N	Y	N	N		The requirements of this rule are less stringent than those established as BAT under rule 3745-31-05(A).



	See comment field.	Subpart HHHHH of Part 63		N	Y	Y	N	N	Y	N	Y	N	N		Subpart HHHHH requires the process vessel be equipped w/lid or cover whenever it contains a HAP & overall capture/control of 75%, by wt., or greater, of HAPs emissions.
	OC emissions must be controlled, overall, by 85%, by wt.	21-07(M)		N	Y	Y	N	N	Y	N	Y	N	N		
	No visible emissions from the stack. PE from stack limited to 3.53 lbs/hr & 15.46 tpy. OC emissions limited to 15.0 lbs/hr & 65.7 tpy.	31-05(A)		N	N	Y	N	N	Y	N	Y	N	N		
P001 & P002	See comment field.	Subpart HHHHH of Part 63		N	Y	Y	N	N	Y	N	Y	N	N		Subpart HHHHH requires the process vessel be equipped w/lid or cover whenever it contains a HAP & overall capture/control of 75%, by wt., or greater, of HAPs emissions.
	See comment field.	31-05(A)		N	N	Y	N	N	Y	N	Y	N	N		Combined OC emissions from P001, P002, P003, P005, T001 & T002 shall not exceed 100 tpy, based on a rolling 12-month summation.



	OC emissions must be controlled, overall, by 85%, by wt.	21-07(M)		N	Y	Y	N	N	Y	N	Y	N	N		
	Visible emissions limited to 20%, except as provided by rule.	17-07(A)		N	N	Y	N	N	Y	N	Y	N	N		
	PE from stack limited to 7.58 lbs/hr.	17-11		N	N	Y	N	N	Y	N	Y	N	N		
P020, P021 & P022	See comment field.	31-05(A)		N	N	Y	N	N	Y	N	Y	N	N		State BAT requires use of an OC condenser for emissions control.  OC emissions limited to 10.5 tpy from P020, P021 & P022, combined.  VOC emissions limited to 5.5 tpy from P020, P021 & P022, each individually.
	See comment field.	Subpart HHHHH of Part 63		N	Y	Y	N	N	Y	N	Y	N	N		Subpart HHHHH requires the process vessel be equipped w/lid or cover whenever it contains a HAP & overall capture/control of 75%, by wt., or greater, of HAPs emissions.
P018, & P023	See comment field.	31-05(A)		N	N	Y	N	N	Y	N	Y	N	N		OC emissions limited to 2.73 lbs/hr&12.0 tpy.



**Statement of Basis**

Henkel Consumer Adhesives, Inc.

**Permit Number:** P0084959

**Facility ID:** 0243081155

	See comment field.	Subpart HHHHH of Part 63		N	Y	Y	N	N	Y	N	Y	N	N		P018 & P023 are Group 2 Storage Tanks, as defined in Subpart HHHHH.
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**DRAFT**

**Division of Air Pollution Control  
Title V Permit  
for  
Henkel Consumer Adhesives, Inc.**

Facility ID:	0243081155
Permit Number:	P0084959
Permit Type:	Renewal
Issued:	6/6/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





Division of Air Pollution Control
Title V Permit
for
Henkel Consumer Adhesives, Inc.

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## Authorization

Facility ID: 0243081155  
Facility Description: Sealant manufacturer  
Application Number(s): A0015560, A0015561, A0015562, A0015563, A0038255  
Permit Number: P0084959  
Permit Description: Title V Renewal permit for adhesives and sealants manufacturing facility.  
Permit Type: Renewal  
Issue Date: 6/6/2012  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0084958

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Henkel Consumer Adhesives, Inc.  
7405 Production Drive  
Mentor, OH 44060

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## **A. Standard Terms and Conditions**



**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

*(Authority for term: ORC 3704.036(A))*

**2. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

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

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the



insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- (4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northeast District Office.

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

### 3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

### 4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:



- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## **5. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

## **6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

## **7. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the



Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

- (1) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when: the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

## 8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## 9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

## 10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

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

## 11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

## 12. Federal and State Enforceability

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

*(Authority for term: OAC rule 3745-77-07(B))*

## 13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) 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.

- (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (3) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. An identification of each term or condition of this permit that is the basis of the certification.
    - b. The permittee's current compliance status.
    - c. Whether compliance was continuous or intermittent.
    - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

**17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that



qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

#### **18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

#### **19. Insignificant Activities or Emissions Levels**

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

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

#### **20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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



**21. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*



**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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.)

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.

**25. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

*(Authority for term: OAC rule 3745-77-07(C))*



**26. 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).

**27. 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.

*(Authority for term: OAC rule 3745-77-01(C))*

**28. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. This facility is subject to the requirements of Subpart HHHHH – National Emissions Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing of 40 CFR Part 63. As defined in Subpart HHHHH it is an *existing affected source*.

In accordance with Section 63.8015(a) of Subpart HHHHH, the permittee must comply with each applicable requirement in Table 3 that applies to your facility's equipment leaks. The permittee has chosen Subparts R and TT of 40 CFR Part 63, as the method to demonstrate compliance with the equipment leaks requirements of Subpart HHHHH.

The permittee has identified valves, pumps, agitators and connectors the exact number of components may vary from time to time as the 'plumbing' is reconfigured to meet the facility's production needs) that require monitoring under Subpart HHHHH and Subparts R and TT. The permittee shall comply with all of the monitoring and record keeping requirements of Subpart HHHHH and Subparts R and TT regarding equipment leak detection and repair (LDAR).

The permittee shall comply with all of the reporting and testing requirements of Subpart HHHHH and Subparts R and TT regarding equipment LDAR.

The permittee shall comply with all of the requirements of Subpart HHHHH no later than December 11, 2006.

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

T002 7,000 Gallon Hyprene L-2000 Oil Storage Tank (PTI No. 02-02306)

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

## C. Emissions Unit Terms and Conditions



1. P005, Shar Mixers

Operations, Property and/or Equipment Description:

Small Open-Top Batch Mixers

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-17-07(A), OAC rule 3745-17-11, OAC rule 3745-31-05(A), and 40 CFR Part 63, Subpart HHHHH.



- (2) Additional Terms and Conditions
  - a. The PE limitation for this emissions unit is based upon Table 1 of OAC Rule 3745-17-11. Figure II of OAC Rule 3745-17-11 does not apply because the uncontrolled mass rate of PE is less than 10 lbs per hour.
  - b. Emissions units P003 and T001 have been permanently shutdown. The 100.0 tons per year OC group emission limitation was established in PTI 02-02306.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall maintain the following information for this emissions unit each day:
    - a. the company identification for each sealant or adhesive produced;
    - b. the total number of batches of each sealant or adhesive processed, "BS", in batches per month;
    - c. the emission factor of sealant/adhesive, in pounds OC per batch, defined as "EF" and calculated as 0.767 lb per batch;
    - d. the total OC emissions from all the batches of sealant or adhesive processed, in tons per month, defined as "TOCs" and calculated as follows:  
$$\text{TOCs} = \text{BS} \times \text{EF}, \text{ divided by conversion factor } 2,000 \text{ lbs/ton, and}$$
    - e. the rolling, 12-month summation of the total OC emissions from this unit, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]
  - (2) The permittee shall maintain the following information each month for emissions unit T002:
    - a. the monthly OC emissions, in tons per month; and
    - b. the rolling, 12-month summation of the total OC emissions, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]
  - (3) The permittee shall maintain the following information each month for emissions units P001, P002, P005 and T002, combined:
    - a. the monthly OC emissions, in tons per month; and
    - b. the rolling, 12-month summation of the total OC emissions, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) All deviation reports shall be submitted in accordance with Section A.2.c) of the Federally Enforceable Standard Terms and Conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit annual reports that specify the total OC emissions from emissions unit P005 itself, and from P001, P002, P005 and T002, combined. The reports shall include the calculations and shall be submitted by February 1<sup>st</sup> of each year and shall cover the previous calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation:

Visible PE from the exhaust stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with the stack visible PE limitation shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-17-03(B)(1)(a)]

b. Emission Limitation:

PE from the stack shall not exceed 5.38 lbs/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated through an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-17-03(B)(10)]

c. Emission Limitation:

OC emissions from this emissions unit shall not exceed 10.0 tons per year.

The OC emissions from emissions units P001, P002, P005 and T002, combined, shall not exceed 100 tons per year, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated based upon the record keeping requirements specified in d)(1), d)(2) and d)(3).

[Authority for term: OAC rule 3745-17-07(C)(1) and PTI 02-02306]

g) Miscellaneous Requirements

(1) None.



2. P011, 100-HP SharMixer

Operations, Property and/or Equipment Description:

Shar Vacuum Mixer for 150 Gallon, Portable Batch Tanks

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the exhaust stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11	PE from the stack shall not exceed 3.11 lbs/hr.  See b)(2)a.
c.	40 CFR Part 63, Subpart HHHHH	This emissions unit is not subject to this rule because the portable batch tanks used are less than 250 gallons capacity, and therefore, do not meet the 'process vessel' definition in Section 63.8105.

(2) Additional Terms and Conditions

a. The PE limitation for this emissions unit is based upon Table 1 of OAC Rule 3745-17-11. Figure II of OAC Rule 3745-17-11 does not apply because the uncontrolled mass rate of PE is less than 10 lbs per hour.

b. This emissions unit was installed under PTI 02-08566.

c) Operational Restrictions

(1) None.

## d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE from the exhaust stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with the stack visible PE limitation shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-17-03(B)(1)(a)]



b. Emission Limitation:

PE from the stack shall not exceed 3.11 lbs/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated through an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-17-03(B)(10)]

g) Miscellaneous Requirements

(1) None.



3. P012, Clear Mixer, 1K mixer #1.

Operations, Property and/or Equipment Description:

An enclosed 1,000 gallon Clear Batch Mixer Tank w/condenser.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	The visible particulate emission limitation required by this applicable rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A).
b.	OAC rule 3745-17-11	Particulate emissions (PE) from the baghouse stack shall not exceed 7.41 lbs/hr.  See b)(2)a.
c.	40 CFR Part 63, Subpart HHHHH	Equip the vessel with a cover or lid that must be in place at all times when the vessel contains a hazardous air pollutant (HAP), except for material additions and sampling.  Considering both capture and any combination of control (except a flare), reduce emissions of organic HAP with a vapor existing pressure $\geq 0.6$ kPa by $\geq 75$ percent by weight, and reduce emissions of organic HAP with a vapor pressure $< 0.6$ kPa by $\geq 60$ percent by weight.  See b)(2)b.



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d.	40 CFR 63.1 – 15 (40 CFR 63.8095)	Table 10 to Subpart HHHHH of 40 CFR Part 63 – Applicability of General Provisions to Subpart HHHHH shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.
e.	OAC rule 3745-21-07(M)	This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions from the article, machine, equipment or other contrivance by an overall control efficiency of at least 85%, by weight.
f.	OAC rule 3745-31-05(A)	There shall be no visible PE from this emissions unit.

(2) Additional Terms and Conditions

- a. The PE limitation for this emissions unit is based upon Table 1 of OAC Rule 3745-17-11. Figure II of OAC Rule 3745-17-11 does not apply because the uncontrolled mass rate of PE is less than 10 lbs per hour.
- b. The Henkel's facility is an *existing affected source* under Subpart HHHHH. Emissions unit P012, the 1K Mixer #1 is a *process vessel* as defined in Section 63.8105 of Subpart HHHHH. It is a 1,000 gallon capacity, stationary, batch tank used to manufacture clear coatings. It shall be equipped with a condenser for HAPs and OC emission control.
- c. The HAPs emissions are a subset of the total organic compound emissions.
- d. The permittee shall comply with all emission limits, work practice standards, as well as other requirements established in 40 CFR Part 63, Subpart HHHHH no later than December 11, 2006.
- e. This emissions unit was installed under PTI 02-08566.

c) 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 91 degrees Fahrenheit, which is the temperature required to meet the emission limitations listed above, based on the equations and procedures in 40 CFR Part 63, Section 63.1257(d)(2) and (3).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. 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 monitor and record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable pressure drop range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and the time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. The investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06, if it is determined that a malfunction has occurred.

The pressure drop across the baghouse shall be maintained within the range of 0.5 to 4.0 inches of water while the emissions unit is in operation.

This range is effective for the duration of this permit, unless a revision is requested by the permittee and approved in writing by the Northeast District Office of the Ohio EPA. The permittee may request a revision to the range of values based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, an approved revision to the range of values will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;



- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emissions incident; and
e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) 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 manufacturer's recommendations, instructions and operating manuals.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) 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; and
b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment and the associated emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections

Table with 2 columns: Reference code and Description. Rows include 63.8080(a) records required by Part 63, Subpart A; 63.8080(d) records of each CPMS calibration check; 63.8000(d)(5) continuous parameter monitoring.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;



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- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) 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). This condition shall become effective upon startup of the emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit quarterly reports that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit semi-annual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required pursuant to 40 CFR Part 63, Subpart HHHHH, per the following sections:

Table with 2 columns: Reference code and Description. Rows include 63.8070(a) submit all required notifications, 63.8070(b) initial notification, 63.8075(a) Table 9 required reports, and 63.8075(b) schedule of Table 9 reports.



Table with 2 columns: Code (63.8075(c), 63.8075(d), 63.8075(e)) and Description (pre-compliance report, notification of compliance status report, compliance report)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (6) All deviation reports shall be submitted in accordance with Section A.2.c) of the Federally Enforceable Standard Terms and Conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

There shall be no visible PE from this emissions unit.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

[Authority for term: OAC rule 3745-17-03(B)(1)(a)]

b. Emission Limitation:

PE from the baghouse stack shall not exceed 7.41 lbs/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated through an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-17-03(B)(10)]

c. Emission Limitation:

Considering both capture and any combination of control (except a flare), reduce emissions of organic HAP with a vapor existing pressure >=0.6 kPa by >=75 percent by weight, and reduce emissions of organic HAP with a vapor pressure <0.6 kPa by >=60 percent by weight.



Applicable Compliance Method:

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.

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 in 40 CFR Part 63, Section 63.1257(d)(2) and (3).

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

d. Emission Limitation:

This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions from the article, machine, equipment or other contrivance by an overall control efficiency of at least 85%, by weight.

Applicable Compliance Method:

The permittee may use the results of the condenser design evaluation required in f)(1)c above to demonstrate compliance with the 85%, by weight, overall control efficiency for organic compounds.

[Authority for term: OAC rule 3745-21-10(A) and OAC rule 3745-77-07(C)]

g) Miscellaneous Requirements

- (1) None.



4. P015, 2K mixer #3.

Operations, Property and/or Equipment Description:

An enclosed 2,000 Gallon Adhesive Batch Mixer Tank w/condenser.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It contains three rows (a, b, c) detailing regulatory requirements and control measures for the mixer tank.



d.	OAC rule 3745-21-07(M)	This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the OC emissions from the article, machine, equipment or other contrivance by an overall control efficiency of at least 85%, by weight.
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(2) Additional Terms and Conditions

- a. The permittee shall comply with all emission limits, work practice standards, as well as other requirements established in 40 CFR Part 63, Subpart HHHHH no later than December 11, 2006.
- b. The Henkel's facility is an *existing affected source* under Subpart HHHHH. Emissions unit P015, the 2K Mixer #3 is a *process vessel* as defined in Section 63.8105 of Subpart HHHHH. It is a 2,000 gallon capacity, stationary, batch tank used to manufacture adhesives and sealants coatings. It shall be equipped with a condenser for HAPs and OC emission control.
- c. PTI P0108470 superseded the requirements of PTI P0105560 issued on Dec. 23, 2009 and PTI 02-14097, issued on August 8, 2000.
- d. The HAPs emissions are a subset of the total OC emissions.

c) 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 106degrees 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 show compliance with the operating limits required in 40 CFR Part 63, Section 63.8005(e) and (f).

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

d) 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).

[Authority for term: OAC rule 3745-77-07(C)(1)]



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- (2) 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 upon startup of the emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections

Table with 2 columns: Code and Description. Rows include 63.8080(a) records required by Part 63, Subpart A; 63.8080(d) records of each CPMS calibration check; 63.8000(d)(5) continuous parameter monitoring.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

e) Reporting Requirements

- (1) The permittee shall submit semi-annual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required pursuant to 40 CFR Part 63, Subpart HHHHH, per the following sections:

Table with 2 columns: Code and Description. Rows include 63.8070(a) submit all required notifications; 63.8070(b) initial notification; 63.8075(a) Table 9 required reports; 63.8075(b) schedule of Table 9 reports; 63.8075(c) pre-compliance report; 63.8075(d) notification of compliance status report; 63.8075(e) compliance report.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (2) 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). This condition shall become effective upon startup of the emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (3) All deviation reports shall be submitted in accordance with Section A.2.c) of the Federally Enforceable Standard Terms and Conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit quarterly reports that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit reports of the results of the initial and annual inspection of the closed vent system in accordance with 40 CFR Part 63, Section 63.983. This condition shall become effective upon startup of the emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. **Emission Limitation:**

Considering both capture and any combination of control (except a flare), reduce emissions of organic HAP with a vapor existing pressure  $\geq 0.6$  kPa by  $\geq 75$  percent by weight, and reduce emissions of organic HAP with a vapor pressure  $< 0.6$  kPa by  $\geq 60$  percent by weight.

Applicable Compliance Method:

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.

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 in 40 CFR Part 63, Section 63.1257(d)(2) and (3).

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]



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b. Emission Limitation:

OC emissions from this emissions unit shall not exceed 8.0 lbs/hr and 35.0 tons per year.

Applicable Compliance Method:

The permittee may use the results of the condenser design evaluation required in f)(1)a above to demonstrate compliance with the 8.0 lbs/hour OC emission limitation.

The tpy emission limitation was developed by multiplying the short-term allowable OC emission limitation (8.0 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: PTI 02-14097 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the OC emissions from the article, machine, equipment or other contrivance by an overall control efficiency of at least 85%, by weight.

Applicable Compliance Method:

The permittee may use the results of the condenser design evaluation required in f)(1)a above to demonstrate compliance with the 85%, by weight, overall control efficiency for OC.

[Authority for term: OAC rule 3745-21-10(A) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



5. P017, 3K Mixer #1

Operations, Property and/or Equipment Description:

An enclosed, 3,000 gallon Adhesive Batch Mixer w/Condenser.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	The visible particulate emission limitation required by this applicable rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A).
b.	OAC rule 3745-17-11	The particulate emission limitation required by this applicable rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A).
c.	40 CFR Part 63, Subpart HHHHH	Equip the vessel with a cover or lid that must be in place at all times when the vessel contains a hazardous air pollutant (HAP), except for material additions and sampling.  Considering both capture and any combination of control (except a flare), reduce emissions of organic HAP with a vapor existing pressure $\geq 0.6$ kPa by $\geq 75$ percent by weight, and reduce emissions of organic HAP with a vapor pressure $< 0.6$ kPa by $\geq 60$ percent by weight.  See b)(2)b.



Table with 3 columns: Reference, Rule, and Description. Row d: 40 CFR 63.1 - 15 (40 CFR 63.8095) - Table 10 to Subpart HHHHH of 40 CFR Part 63 - Applicability of General Provisions to Subpart HHHHH shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply. Row e: OAC rule 3745-21-07(M) - This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions from the article, machine, equipment or other contrivance by an overall control efficiency of at least 85%, by weight. Row f: OAC rule 3745-31-05(A) - There shall be no visible particulate emissions from this emissions unit. Particulate emissions (PE) from this emissions unit shall not exceed 3.53 lbs/hr and 15.46 tons per year. Organic compound (OC) emissions, including OC emissions from cleanup materials, from this emissions unit shall not exceed 15.0 lbs/hr and 65.7 tons per year. See b)(2)c.

(2) Additional Terms and Conditions

- a. The Henkel's facility is an existing affected source under Subpart HHHHH. Emissions unit P017, the 3K Mixer #1 is a process vessel as defined in Section 63.8105 of Subpart HHHHH. It is a 3,000 gallon capacity, stationary, batch tank used to manufacture adhesives and sealants coatings. It shall be equipped with a condenser for HAPs and OC emission control.
b. The permittee shall comply with all emission limits, work practice standards, as well as other requirements established in 40 CFR Part 63, Subpart HHHHH no later than December 11, 2006.
c. This emissions unit was installed under PTI 02-18877.

c) Operational Restrictions

- a. The pressure drop across the baghouse shall be maintained within the range of 1.0 to 6.0 inches of water while the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-18877]

- b. 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 100 degrees Fahrenheit, which is the temperature required to meet the emission limitations listed above, based on the equations and procedures in 40 CFR Part 63, Section 63.1257(d)(2) and (3).

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

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while this 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. The permittee shall record the pressure drop across the baghouse on a weekly basis.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) 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 manufacturer's recommendations, instructions and operating manuals.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) 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; and
  - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment and the associated emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]



- (4) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections

Table with 2 columns: Code and Description. Rows include 63.8080(a) records required by Part 63, Subpart A; 63.8080(d) records of each CPMS calibration check; 63.8000(d)(5) continuous parameter monitoring.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) 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). This condition shall become effective upon startup of the emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (2) The permittee shall submit quarterly reports that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit semi-annual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required pursuant to 40 CFR Part 63, Subpart HHHHH, per the following sections:

Table with 2 columns: Code and Description. Rows include 63.8070(a) submit all required notifications; 63.8070(b) initial notification; 63.8075(a) Table 9 required reports; 63.8075(b) schedule of Table 9 reports; 63.8075(c) pre-compliance report; 63.8075(d) notification of compliance status report; 63.8075(e) compliance report.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]



- (4) All deviation reports shall be submitted in accordance with Section A.2.c) of the Federally Enforceable Standard Terms and Conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not maintained at the required range.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

There shall be no visible particulate emissions from this emissions unit.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

[Authority for term: OAC rule 3745-17-03(B)(1)(a)]

b. Emission Limitation:

PE from this emissions unit shall not exceed 3.53 lbs/hr and 15.46 tons per year.

Applicable Compliance Method:

If required, compliance shall be demonstrated through an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

The tpy emission limitation was developed by multiplying the short-term allowable PE limitation (3.53 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-17-03(B)(10)]

c. Emission Limitation:

Considering both capture and any combination of control (except a flare), reduce emissions of organic HAP with a vapor existing pressure  $\geq 0.6$  kPa by  $\geq 75$

percent by weight, and reduce emissions of organic HAP with a vapor pressure <0.6 kPa by ≥60 percent by weight.

Applicable Compliance Method:

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.

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 in 40 CFR Part 63, Section 63.1257(d)(2) and (3).

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

d. Emission Limitation:

OC emissions, including OC emissions from cleanup materials, from this emissions unit shall not exceed 15.0 lbs/hr and 65.7 tons per year.

Applicable Compliance Method:

The permittee may use the results of the condenser design evaluation required in f)(1)c to demonstrate compliance with the 15.0 lbs/hr OC emission limitation.

The tpy emission limitation was developed by multiplying the short-term allowable OC emission limitation (15.0 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-21-10(A) and OAC rule 3745-77-07(C)(1)]

g) **Miscellaneous Requirements**

(1) None.



**6. Emissions Unit Group -2,000 Gal. Adhesive Batch Mixers: P001 & P002.**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P001	2K mixer #1, a 2,000 gallon Adhesive Batch Mixer (w/condenser)
P002	2K mixer #2, a 2,000 gallon Adhesive Batch Mixer (w/condenser)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	40 CFR Part 63, Subpart HHHHH	Equip the vessel with a cover or lid that must be in place at all times when the vessel contains a hazardous air pollutant (HAP), except for material additions and sampling.  Considering both capture and any combination of control (except a flare), reduce emissions of organic HAP with a vapor existing pressure $\geq 0.6$ kPa by $\geq 75$ percent by weight, and reduce emissions of organic HAP with a vapor pressure $< 0.6$ kPa by $\geq 60$ percent by weight.
b.	40 CFR 63.1 – 15 (40 CFR 63.8095)	Table 10 to Subpart HHHHH of 40 CFR Part 63 – Applicability of General Provisions to Subpart HHHHH shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.
c.	OAC rule 3745-31-05(A) (PTI 02-02306)	Organic compound (OC) emissions, including OC emissions from cleanup materials, from emissions units P001, P002, P005 and T002, combined, shall not exceed 100.0 tons per year, based on a rolling, 12-month summation.  See b(2)b.

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d.	OAC rule 3745-21-07(M)	This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the OC emissions from the article, machine, equipment or other contrivance by an overall control efficiency of at least 85%, by weight.
e.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the baghouse exhaust stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
f.	OAC rule 3745-17-11	PE from the baghouse exhaust stack shall not exceed 7.58 lbs/hr.

(2) Additional Terms and Conditions

- a. The Henkel's facility is an *existing affected source* under Subpart HHHHH. Emissions unit P015, the 2K Mixer #3 is a *process vessel* as defined in Section 63.8105 of Subpart HHHHH. It is a 2,000 gallon capacity, stationary, batch tank used to manufacture adhesives and sealants coatings. It shall be equipped with a condenser for HAPs and OC emission control.
- b. Emissions units P003 and T001 have been permanently shutdown. The 100.0 tons per year OC group emission limitation was established in PTI 02-02306.
- c. The HAPs emissions are a subset of the total OC emissions.
- d. The permittee shall comply with all emission limits, work practice standards, as well as other requirements established in 40 CFR Part 63, Subpart HHHHH no later than December 11, 2006.

c) 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 required to meet the emission limitations listed above, based on the equations and procedures in 40 CFR 63.1257(d)(2) and (3).

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

d) 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 manufacturer's recommendations, instructions and operating manuals.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (2) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections

63.8080(a)	records required by Part 63, Subpart A
63.8080(d)	records of each CPMS calibration check
63.8000(d)(5)	continuous parameter monitoring

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (3) 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; and
  - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment and the associated emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (4) The permittee shall properly install, operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. 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 monitor and record the pressure drop, in inches of water, across the baghouse on a weekly basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable pressure drop range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and the time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation,

the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. The investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06, if it is determined that a malfunction has occurred.

The pressure drop across the baghouse shall be maintained within the range of 0.5 to 4.0 inches of water while the emissions unit is in operation.

This range is effective for the duration of this permit, unless a revision is requested by the permittee and approved in writing by the Northeast District Office of the Ohio EPA. The permittee may request a revision to the range of values based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, an approved revision to the range of values will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall keep the following information for this emissions unit each month:
- a. the company identification for each sealant or adhesive produced;
  - b. the total number of batches of each sealant or adhesive processed, "BS", in batches per day;
  - c. the company identification for each solvent, including cleanup materials, employed in the sealant/adhesive production operations;
  - d. the total amount of each solvent, including cleanup materials, employed in the sealant/adhesive production operations, "AS", in gallons per batch;
  - e. the density of each solvent, including cleanup materials, employed in the sealant/adhesive production operations, "DS", in lbs per gallon;
  - f. the total OC emissions from all the solvents, including cleanup materials, employed in the sealant/adhesive production operations, in tons per month, defined as "TOC", and calculated as follows:

TOC = the sum for all batches each month, from  $i = 1$  to  $i = n$  of  $(AS \times DS)_i \times SL \times [1 - (OCE/100)]$ , and divided by the conversion factor 2,000 lbs/ton

where:

$i$  = subscript denoting an individual batch of adhesives/sealants;

$n$  = the total number of different batches of adhesives/sealants;

SL = the maximum solvent loss factor, 2% (.02) by weight, from AP-42, May 1983, Section 6.4.1; and

OCE = the overall control efficiency, in percent by weight, determined as 85% by the most recent condenser design evaluation;

- g. the rolling, 12-month summation of the total OC emissions from this emissions unit, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-02306]

- (6) The permittee shall keep the following information each month for emissions unit T002:

- a. the monthly OC emissions, in tons per month; and
- b. the rolling, 12-month summation of the total OC emissions, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-02306]

- (7) The permittee shall keep the following information each month for emissions units P001, P002, P005 and T002:

- a. the monthly OC emissions, in tons per month; and
- b. the rolling, 12-month summation of the total OC emissions, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-02306]

e) 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). This condition shall become effective upon startup of the emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (2) The permittee shall submit quarterly reports that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

- a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;
- b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

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- c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit reports of the results of the initial and annual inspection of the closed vent system in accordance with 40 CFR Part 63, Section 63.983. This condition shall become effective upon startup of the emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (5) The permittee shall submit semi-annual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required pursuant to 40 CFR Part 63, Subpart HHHHH, per the following sections:

63.8070(a)	submit all required notifications
63.8070(b)	initial notification
63.8075(a)	Table 9 required reports.
63.8075(b)	schedule of Table 9 reports
63.8075(c)	pre-compliance report
63.8075(d)	notification of compliance status report
63.8075(e)	compliance report

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (6) All deviation reports shall be submitted in accordance with Section A.2.c) of the Federally Enforceable Standard Terms and Conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall submit annual reports that specify the total OC emissions from emissions units P001, P002, P005 and T002, combined. The reports shall include the calculations and shall be submitted by February 1<sup>st</sup> of each year and shall cover the previous calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-2306]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Considering both capture and any combination of control (except a flare), reduce emissions of organic HAP with a vapor existing pressure  $\geq 0.6$  kPa by  $\geq 75$  percent by weight, and reduce emissions of organic HAP with a vapor pressure  $< 0.6$  kPa by  $\geq 60$  percent by weight.

Applicable Compliance Method:

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.

- i. 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 in 40 CFR Part 63, Section 63.1257(d)(2) and (3).
- ii. 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- b. Emission Limitation:

OC emissions, including OC emissions from cleanup materials, from emissions units P001, P002, P005 and T002, combined, shall not exceed 100.0 tons per year, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this emission limitation may be demonstrated by the results of the record keeping requirement specified in d)(7).

[Authority for term: OAC rule 3745-17-07(C)(1) and PTI 02-02306]

c. Emission Limitation:

This emissions unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the OC emissions from the article, machine, equipment or other contrivance by an overall control efficiency of at least 85%, by weight.

Applicable Compliance Method:

The permittee may use the results of the condenser design evaluation required in f)(1)a above to demonstrate compliance with the 85%, by weight, overall control efficiency for OC.

[Authority for term: OAC rule 3745-17-07(C)(1) and OAC rule 3745-21-07(M)]

d. Emission Limitation:

Visible PE from the baghouse exhaust stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-17-03(B)(1)(a)]

e. Emission Limitation:

PE from the baghouse exhaust stack shall not exceed 7.58 lbs/hr.

Applicable Compliance Method:

If required, compliance with the stack PE limitation shall be demonstrated based on an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-17-03(B)(10)]

g) Miscellaneous Requirements

(1) None.

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**7. Emissions Unit Group -4,000 Gal. Group 2 Storage Tanks: P020,P021,P022,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P020	4,000 gallon Holding/Storage Tank No. 61 (TK-61) for finished adhesive products.
P021	4,000 gallon Holding/Storage Tank No. 62 (TK-62) for finished adhesive products.
P022	4,000 gallon Holding/Storage Tank No. 63 (TK-63) for finished adhesive products.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A) (PTI P0107480)	The BAT includes a holding/storage tank, with an organic compound (OC) condenser for emissions control.  OC emissions shall not exceed 10.5 tons per year from each of emissions units P020, P021 and P022.  Volatile organic compound (VOC) emissions shall not exceed 5.5 tons per year from emissions units P020, P021 and P022, combined.  (VOC emissions are a subset of the OC emissions.)
b.	40 CFR Part 63, Subpart HHHHH	This emissions unit is a Group 2 Storage Tank, as defined in Section 63.8105 of Subpart HHHHH.  See b)(2)a and b)(2)b.
c.	40 CFR 63.1 – 15 (40 CFR 63.8095)	Table 10 to Subpart HHHHH of 40 CFR Part 63 – Applicability of General Provisions to Subpart HHHHH shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. The Henkel facility is an *existing affected source* under Subpart HHHHH. This emissions unit is a *Group 2 Storage Tank*, as defined in Section 63.8105 of Subpart HHHHH. It shall be equipped with control equipment consisting of a permanent totally enclosed (sealed cover) vessel, nitrogen blanket and condenser system for OC emissions control.
- b. The permittee shall comply with all emission limits, work practice standards, as well as other requirements established in 40 CFR Part 63, Subpart HHHHH no later than December 11, 2006.

c) 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 required to meet the emission limitations listed above, based on the equations and procedures in 40 CFR 63.1257(d)(2) and (3).

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

d) 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 manufacturer's recommendations, instructions and operating manuals.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (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; and
- b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment and the associated emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

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- (3) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections

63.8080(a)	records required by Part 63, Subpart A
63.8080(d)	records of each CPMS calibration check
63.8000(d)(5)	continuous parameter monitoring

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

e) 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). This condition shall become effective upon startup of the emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (2) All deviation reports shall be submitted in accordance with Section A.2.c) of the Federally Enforceable Standard Terms and Conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit quarterly reports that include a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (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 specified by rule.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (5) The permittee shall submit semi-annual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required pursuant to 40 CFR Part 63, Subpart HHHHH, per the following sections:

63.8070(a)	submit all required notifications
63.8070(b)	initial notification
63.8075(a)	Table 9 required reports.

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63.8075(b)	schedule of Table 9 reports
63.8075(c)	pre-compliance report
63.8075(d)	notification of compliance status report
63.8075(e)	compliance report

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 10.5 tons per year from each of emissions units P020, P021 and P022.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the maximum controlled OC potential to emit (2.4 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton.

[Authority for term: OAC rule 3745-17-07(C)(1) and PTI P0107480]

b. Emission Limitation:

VOC emissions shall not exceed 5.5 tons per year from emissions units P020, P021 and P022, combined.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the maximum controlled VOC potential to emit (1.2 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton.

[Authority for term: OAC rule 3745-17-07(C)(1) and PTI P0107480]

(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.

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- a. 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

g) Miscellaneous Requirements

- (1) None.

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

**8. Emissions Unit Group -6,000 Gal. Group 2 Storage Tanks: P018,P023,**

EU ID	Operations, Property and/or Equipment Description
P018	6,000 Gallon Holding Tank (TK-59) for finished adhesives products.
P023	6,000 Gallon Product Storage Tank (TK-64) for finished adhesives products.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A) (PTI P0107480)	Organic compound (OC) emissions, including OC emissions from cleanup materials, from this emissions unit shall not exceed 2.73 lbs per hour and 12.0 tons per year.
b.	40 CFR Part 63, Subpart HHHHH	This emissions unit is a Group 2 Storage Tank, as defined in Section 63.8105 of Subpart HHHHH.  See b.(2)a and b)(2)b.
c.	40 CFR 63.1 – 15 (40 CFR 63.8095)	Table 10 to Subpart HHHHH of 40 CFR Part 63 – Applicability of General Provisions to Subpart HHHHH shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The Henkel facility is an *existing affected source* under Subpart HHHHH. This emissions unit is a *Group 2 Storage Tank* as defined in Section 63.8105 of Subpart HHHHH. It shall be equipped with control equipment consisting of a permanent totally enclosed (sealed cover) vessel, nitrogen blanket and condenser system for OC emissions control.

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

c) 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 required to meet the emission limitations listed above, based on the equations and procedures in 40 CFR 63.1257(d)(2) and (3).

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

d) 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 manufacturer's recommendations, instructions and operating manuals.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (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; and
  - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment and the associated emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (3) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections

63.8080(a)	records required by Part 63, Subpart A
63.8080(d)	records of each CPMS calibration check
63.8000(d)(5)	continuous parameter monitoring

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

e) 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

**Draft Title V Permit**

Henkel Consumer Adhesives, Inc.

**Permit Number:** P0084959

**Facility ID:** 0243081155

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

in the condenser design evaluation, in accordance with 40 CFR Part 63, Section 63.1257(d). This condition shall become effective upon startup of the emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (2) All deviation reports shall be submitted in accordance with Section A.2.c) of the Federally Enforceable Standard Terms and Conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit quarterly reports that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (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 specified by rule.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

- (5) The permittee shall submit semi-annual reports and such other notifications and reports to the Ohio EPA, Northeast District Office as are required pursuant to 40 CFR Part 63, Subpart HHHHH, per the following sections:

63.8070(a)	submit all required notifications
63.8070(b)	initial notification
63.8075(a)	Table 9 required reports.
63.8075(b)	schedule of Table 9 reports
63.8075(c)	pre-compliance report
63.8075(d)	notification of compliance status report
63.8075(e)	compliance report

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions, including OC emissions from cleanup materials, from this emissions unit shall not exceed 2.73 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the test methods and procedures specified in f)(2).

[Authority for term: OAC rule 3745-17-07(C)(1) and PTI P0107480]

b. Emission Limitation:

OC emissions, including OC emissions from cleanup materials, from this emissions unit shall not exceed 12.0 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable OC emission limitation (2.73 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-17-07(C)(1) and PTI P0107480]

(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 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart HHHHH]

g) Miscellaneous Requirements

(1) None.