



State of Ohio Environmental Protection Agency

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RE: **FINAL PERMIT TO INSTALL MODIFICATION CERTIFIED MAIL**
SHELBY COUNTY
Application No: 05-08246

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 5/18/2004

Thermoseal Inc
Robert Leighty
2350 Campbell Rd
Sidney, OH 453659501

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

SWDO



FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 05-08246

Application Number: **05-08246**APS Premise Number: **0575010161**Permit Fee: **\$0**Name of Facility: **Thermoseal Inc Leighty**Person to Contact: **Robert**Address: **2350 Campbell Rd
Sidney, OH 453659501**Location of proposed air contaminant source(s) [emissions unit(s)]:
**2350 Campbell Rd
Sidney, OHIO**

Description of modification:

Modification to remove leak detection requirements that were contained in 40 CFR Part 60 Subpart VV and OAC 3745-21-09(DD).

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Thermoseal Inc

PTI Application: 05-08246

Modification Issued: 5/18/2004

Facility ID: **0575010161**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

Thermoseal Inc

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PUBLIC DISCLOSURE

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

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

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

SOURCE OPERATION AND OPERATING PERMIT REQUIREMENTS AFTER COMPLETION OF CONSTRUCTION

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

Thermoseal Inc**PTI Application: 05-08246****Modification Issued: 5/18/2004**Facility ID: **0575010161****AIR EMISSION SUMMARY**

The air contaminant emissions units listed below comprise the Permit to Install for **Thermoseal Inc** located in **SHELBY** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal and OAC Rules	Permit Allowable Mass Emissions and Control/Usage Requirements
P001	2092 lbs/hr Mixer #1	Use of a solvent recovery and filter systems to minimize organic emissions and combined usage and emission limitations	3745-31-05 3745-21-07 (G)(2) 3745-17-11	21.24 lbs of organic compound (OC) per day; 0.17 lb of particulate/PM ₁₀ per hour; and the combined emissions from the emissions units in this PTI plus P020 shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period.
P011	2092 lbs/hr Mixer #2	Use of a solvent recovery and filter systems to minimize organic emissions and combined usage and emission limitations.	3745-31-05 3745-21-07 (G)(2) 3745-17-11	21.24 lbs of organic compound (OC) per day; 0.17 lb of particulate/PM ₁₀ per hour; and the combined emissions from the emissions units in this PTI plus P020 shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period.
P008	2092 lbs/hr Mixer # 3	Use of a solvent recovery and filter systems to minimize organic emissions and combined usage and emission limitations.	3745-31-05 3745-21-07 (G)(2) 3745-17-11	21.24 lbs of organic compound (OC) per day; 0.17 lb of particulate/PM ₁₀ per hour; and the combined emissions from the emissions units in this PTI plus P020 shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period.

P009	2092 lbs/hr Mixer # 4	Use of a solvent recovery and filter systems to minimize organic emissions and combined usage and emission limitations.	3745-31-05 3745-21-07 (G)(2) 3745-17-11	21.24 lbs of organic compound (OC) per day; 0.17 lb of particulate/PM ₁₀ per hour; and the combined emissions from the emissions units in this PTI plus P020 shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period.
P002	714 lbs/hr Calender #1	Use of a solvent recovery system to minimize organic emissions and combined usage and emission limitations	3745-31-05 3745-21-07(G)(2)	722.7 lbs of organic compound (OC) per day; the combined emissions from the emissions units in this PTI plus P020 shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period
P003	714 lbs/hr Calender #2	Use of a solvent recovery system to minimize organic emissions and emission limitations	3745-31-05 3745-21-07(G)(2)	722.7 lbs of organic compound (OC) per day; the combined emissions from the emissions units in this PTI plus P020 shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period
P004	714 lbs/hr Calender #3	Use of a solvent recovery system to minimize organic emissions and combined usage and emission limitations	3745-31-05 3745-21-07(G)(2)	722.7 lbs of organic compound (OC) per day; the combined emissions from the emissions units in this PTI plus P020 shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period
P005	714 lbs/hr Calender #4	Use of a solvent recovery system to minimize organic emissions and combined usage and emission limitations	3745-31-05 3745-21-07(G)(2)	722.7 lbs of organic compound (OC) per day; the combined emissions from the emissions units in this PTI plus P020 shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period

P015	714 lbs/hr Calender #5	Use of a solvent recovery system to minimize organic emissions and combined usage and emission limitations	3745-31-05 3745-21-07(G)(2)	722.7 lbs of organic compound (OC) per day; the combined emissions from the emissions units in this PTI plus P020 shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period
P013	Ethanol distillation	Material throughput limitations	3745-31-05	19.1 lbs of organic compound (OC) per day; less than 1,000 tons of organic material processed per 12-month period. The combined emissions from the emissions units in this PTI plus P020 shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period
P016	Lurgi Toluene decantering	Use of a solvent recovery system to minimize organic emissions and combined usage and emission limitations	3745-31-05	2.9 lbs of organic compound (OC) per day; the combined emissions from the emissions units in this PTI plus P020 shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period
P017	Croftshaw toluene decantering	Use of a solvent recovery system to minimize organic emissions and combined usage and emission limitations	3745-31-05	2.9 lbs of organic compound (OC) per day; the combined emissions from the emissions units in this PTI plus P020 shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period
P018	Vulcan toluene decantering	Use of a solvent recovery system to minimize organic emissions and combined usage and emission limitations	3745-31-05	4.7 lbs of organic compound (OC) per day; the combined emissions from the emissions units in this PTI plus P020 shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period

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**SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

Pollutant	Tons/Year
OC	180.0
Particulate/PM ₁₀	4.0

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than five years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Southwest District Office , DAPC, 401 East Fifth Street, Dayton, Ohio 45402-2911.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Southwest District Office, 401 E. Fifth Street, Dayton, Ohio 45402-2911.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. The overall emissions of organic compound (OC) from the emissions units in this PTI plus P020 shall not exceed 58.3 tons per rolling 30-day period and 180 tons per rolling 365-day period.

The cumulative organic compound emissions shall be calculated at the end of each day using the previous 365-day data. This data must be demonstrated to be consistent with the intent of the 1999 mass balance protocol agreement between the Ohio EPA and Thermoseal.

2. This facility shall be equipped with a solvent capture and recovery system that reduces the overall OC emissions by at least 90.6%, by weight, as based on a rolling 30-day period.

In order to assure compliance, this facility shall maintain records that demonstrate compliance with the maintenance and monitoring standards as established in the 1999 mass balance protocol agreement between the Ohio EPA and Thermoseal.

3. The OC content of the gasket mash produced by the mixers, emissions units P001, P011, P008, and P009, shall not exceed 45% by weight, per batch.

4. Compliance with the daily organic compound emission limitations for each of the emissions units at this facility shall be determined based on the following equations:

For mixers:

$$Ed = Mp * Moc * 1\% * (1 - Cf) * 24 = 21.24 \text{ lbs/day}$$

For Calenders:

$$Ed = \{[(Mp * Moc) - (Mp * Moc * 0.3\%)] * (1 - Cf)\} * 24 = 722.7 \text{ lbs OC/day}$$

For the solvent condensing and toluene decanting operations:

$$Ed = \{[(Mp/2000 * 3.3) + (Mp/2000 * 0.00024)] * (1 - Cf)\} * 24 = \begin{array}{l} 2.9 \text{ lbs OC/day (P016 - 17)} \\ 4.7 \text{ lbs OC/day (P018)} \end{array}$$

For the ethanol distillation:

$$Ed = \{[(Mp/2000 * 3.3) + (Mp/2000 * 0.00024)] * 24 = 19.1 \text{ lbs OC/day}$$

Where:

ED= daily organic compound emissions

Mp= maximum hourly capacity, in pounds

Moc= maximum organic compound content, in percent by weight

Cf= the overall capture and control efficiency

This facility shall maintain records that demonstrate the maximum emissions of each pollutant emitted from the above mentioned emissions units. These records shall constitute continuous recordkeeping as long as there is no increase in the maximum hourly emissions from the above emissions units.

5. The amount of liquid organic material processed through emissions unit P013, the ethanol distillation, shall not exceed 1,000 tons per rolling 365-day period.
6. The permittee shall collect and record the information each day in accordance with the established requirements of the 1999 mass balance protocol agreements between the Ohio EPA and Theromseal. This information shall demonstrate the following:
 - a. The calculated organic compound emissions, in tons emitted per the last 30-days;
 - b. The calculated organic compound emissions, in tons emitted per the last 365-days; and
 - c. The calculated 30-day overall capture and control efficiency of the solvents recovery system of the organic compound emissions.

The above items shall be calculated in accordance with methods and formulas as established in the agreed upon mass balance protocol.

The permittee shall submit to the Director deviation (excursion) reports which include the following information:

- a. All daily records showing that the calculated 30 day overall control OC efficiency, 30-day allowable OC emission rate, and/or the 365-day allowable OC emission rate were exceeded; and
- b. All daily records showing that the calculated overall capture and control efficiency of the solvent recovery system is below 90.6%, by weight.
- c. If no deviations (excursions) occurred during a reporting period, then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) by January 31, April 30, July 31 and October 31.

7. The permittee shall maintain daily records that list the following information on the materials mixed in the emissions units P001, P011, P008, and P009 :

- a. The company identification of the materials being mixed, in each batch;
- b. The amount of material mixed, in each batch; and
- c. The OC content of the materials being mixed, in percent by weight, in each batch.

The permittee shall notify the Director of any daily record showing that the percent of organic compounds, in percent by weight, exceeds the applicable maximum limit. If no deviations (excursions) occurred during a reporting period, then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) by January 31, April 30, July 31 and October 31.

8. The permittee shall maintain daily records that list the following information on the materials processed through emissions unit P013:

- i. The company identification of the liquid organic materials being processed;
- b. The amount of liquid organic material processed, in tons; and
- c. The calculated amount of liquid organic material processed, in tons processed per the last 365-days.

The permittee shall notify the Director of any daily record showing that the amount of organic compounds processed exceeds the applicable maximum limit. If no deviations (excursions) occurred during a reporting period, then the deviation (excursions) reports submitted by the permittee shall state so. The permittee shall submit the quarterly deviation reports to the Director (the Southwest District Office) by January 31, April 30, July 31 and October 31.