



Street Address:

State of Ohio Environmental Protection Agency  
Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:  
Lazarus Gov.  
Center

**RE: FINAL PERMIT TO INSTALL  
LUCAS COUNTY  
Application No: 04-01092**

**CERTIFIED MAIL**

**DATE: 10/12/2000**

Borden Chemical Inc  
Jeff Krause  
10330 W Roosevelt Road  
Westchester, IL 60154

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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 Director's 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  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA  
TOLEDO DIVISION OF ENVIRONMENTAL SERVICES

**Permit To Install  
Terms and  
Conditions**

**Issue Date: October 12, 2000  
Effective Date: October 12, 2000**

**FINAL PERMIT TO INSTALL 04-01092**

Application Number: 04-01092  
APS Premise Number: 0448011215  
Permit Fee: **\$4800**  
Name of Facility: Borden Chemical Inc  
Person to Contact: Jeff Krause  
Address: 10330 W Roosevelt Road  
Westchester, IL 60154

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

**4243 South Avenue  
Toledo, Ohio**

Description of proposed emissions unit(s):

**INSTALLATION & MODIFICATION OF EQUIPMENT FOR REFACTORY COATING MIXING.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**Borden Chemical Inc**  
PTI Application: **04-01092**  
Date: **October 12, 2000**

**Facility ID: 0448011215**

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

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

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

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

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

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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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.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

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

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

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Environmental Protection Agency if the proposed sources are inadequate 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 prove to be inadequate or cannot meet applicable standards.

**10. Public Disclosure**

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

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	1.7 (0.6 increase)
VOC	33 (0.9 increase)
Formaldehyde	0.1

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**Borden Chemical Inc**  
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**Facility ID: 0448011215**

**Emissions Unit ID: P001**

## **PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001- water paste machine No.4 (200 gallons), Baker Perkins paste mixer (10,000 lbs/hr) with fabric filtration. modification	OAC rule 3745-31-05(A)(3)	20 per cent opacity from fugitive sources as a 3-minute average, no visible emissions from the stack, 0.03 pound per hour of particulates, 0.12 ton per year of particulates, and see Section II.A.2.a.
	OAC rule 3745-17-07(B)(1)	see Section II.A.2.b.
	OAC rule 3745-17-08(B), (B)(3)	see Section II.A.2.b.
	OAC rule 3745-21-07(G)(9)(c), (d)	see Section II.A.2.c.

### **2. Additional Terms and Conditions**

- 2.a The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.
- 2.b The emissions limitations established pursuant to this applicable rule are less restrictive or equivalent to the emissions limitations established by the best available technology determination of PTI 04-367, as issued on November 26, 1986, and modified by PTI 04-1092.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated

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with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each month for all emissions units:
  - a. The company identification for each formaldehyde containing material employed.
  - b. The number of gallons of each formaldehyde containing material employed.
  - c. The formaldehyde content of each formaldehyde containing material, in pounds per gallon.
  - d. The formaldehyde emission rate for all formaldehyde containing materials, in pounds per rolling 12-month period.

**D. Reporting Requirements**

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined formaldehyde emissions from all emissions units exceeded 175 pounds as a rolling 12-month summation, and the actual formaldehyde emissions for each such 12-month period.
3. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

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**Facility ID: 0448011215**

**Emissions Unit ID: P001**

**E. Testing Requirements**

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

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**Emissions Unit ID: P001**

1. Emission limitation:

20 per cent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(3).

2. Emission limitation:

no visible emissions from the stack.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

3. Emission limitation:

0.03 pound per hour of particulates and 0.12 ton per year of particulates.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(10).

4. Formulation data or USEPA Method 24 shall be used to determine organic compound contents.

5. Emission limitation:

The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section

**Borden Chemical Inc**  
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**Emissions Unit ID: P001**

II.C.2. Formulation data shall be used to determine the formaldehyde contents of the materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of Method 18 of 40 CRF Part 60, Appendix A, or approved alternate.

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**Emissions Unit ID: P001**

**F. Miscellaneous Requirements**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002- solvent paste machine No.8 (200 gallons), also water paste at times, Baker Perkins mixer (10,000 lbs/hr) with fabric filtration. modification	OAC rule 3745-31-05(A)(3)	20 per cent opacity from fugitive sources as a 3-minute average, no visible emissions from the stack, 0.03 pound per hour of particulates, 0.13 ton per year of particulates, 39 pounds per hour of organic compounds (OC), 33 tons OC per rolling 12-month period facility-wide, and see Sections II.A.2.a. and 2.b.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B), (B)(3) OAC rule 3745-21-07(G)(9)(d)	see Section II.A.2.c. see Section II.A.2.c. see Section II.A.2.d.

**2. Additional Terms and Conditions**

- 2.a The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.
- 2.b Combined facility wide emissions shall not exceed 10 tons individual, or 25 tons total, of hazardous air pollutants (HAP) in any rolling 12-month period.

**Borden Chemical Inc**  
 PTI Application: **04-01092**  
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**Emissions Unit ID: P002**

- 2.c** The emissions limitations established pursuant to this applicable rule are less restrictive or equivalent to the emissions limitations established by the best available technology determination of PTI 04-367, as issued on November 26, 1986, and modified by PTI 04-1092.
- 2.d** The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

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

## **B. Operational Restrictions**

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day for the mixing operation:
  - a. The company identification for each liquid organic material employed.
  - b. The number of gallons of each liquid organic material employed.
  - c. The organic compound content of each liquid organic material, in pounds per gallon.
  - d. The total organic compound emission rate for all liquid organic materials, in pounds per day.
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly organic compound emission rate for all liquid organic materials, i.e., (d)/(e), in pounds per hour (average).
  - g. The combined facility-wide emissions of organic compounds for all emissions units, in tons as a rolling 12-month summation.

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information for each month for all emissions units:
  - a. The company identification for each HAP containing material employed.
  - b. The number of gallons of each HAP containing material employed.
  - c. The individual HAP content of each HAP containing material, in pounds per gallon.
  - d. The facility-wide summation of each individual HAP emission, and a total of the combined HAP emissions, for all HAP containing materials, in pounds or tons per rolling 12-month period.

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

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the liquid organic materials and photochemically reactive cleanup materials exceeded 39 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined organic compound emissions from all emissions units exceeded 33 tons as a rolling 12-month summation, and the actual organic compound emissions for each such rolling 12-month period.
  - c. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined formaldehyde emissions from all emissions units exceeded 175 pounds per calendar year, and the year-to-date actual formaldehyde emissions for each such month.

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**Emissions Unit ID: P002**

- d. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined facility-wide emissions of any individual HAP exceeded 10 tons per 12-month rolling period, and the 12-month summation of any such HAP emissions for each such month.
  - e. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined facility-wide emissions of all HAPs exceeded 25 tons per 12-month rolling period, and the 12-month summation of HAP emissions for each such month.
3. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

## 1. Emission limitation:

20 per cent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(3).

## 2. Emission limitation:

no visible emissions from the stack.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

## 3. Emission limitation:

0.03 pound per hour of particulates and 0.13 ton per year of particulates.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

## 4. Emission limitation:

39 pounds per hour of organic compounds (OC) and 33 tons per year OC facility-wide.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the liquid organic materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

5. Emission limitation:

the combined facility-wide emissions of formaldehyde shall not exceed 175 pounds per year, and the combined facility wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons individual, or 25 tons total, in any 12-month rolling period.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.3. Formulation data shall be used to determine the chemical contents of the materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of Method 18 of 40 CRF Part 60, Appendix A, or approved alternate.

**F. Miscellaneous Requirements**

This permit allows the use of the coatings and cleanup materials specified by the permittee in the permit to install applications of P001, P002, P003, P005, P008, P010, P011, P013, P018, P019, P020 and P021. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compound emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN 3.0 model and a comparison of the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant as a facility wide total:

1. Pollutant: isopropanol

TLV ( $\mu\text{g}/\text{m}^3$ ): 983,000

Maximum Hourly Emission Rate (lbs/hr): 63.21

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Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 11,100

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 23,400

2. Pollutant: hexane

TLV ( $\mu\text{g}/\text{m}^3$ ): 176,000

Maximum Hourly Emission Rate (lbs/hr): 19.49

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3,420

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4,190

3. Pollutant: methanol

TLV ( $\mu\text{g}/\text{m}^3$ ): 262,000

Maximum Hourly Emission Rate (lbs/hr): 11.25

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 1,970

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 6,240

4. Pollutant: naphtha

TLV ( $\mu\text{g}/\text{m}^3$ ): 1,420,000

Maximum Hourly Emission Rate (lbs/hr): 20.36

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3,570

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 33,800

As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:

5. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

6. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);
7. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and,
8. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003- water paste machine No.3 (200 gallons), J.H. Day paste mixer (10,000 lbs/hr) with fabric filtration. modification	OAC rule 3745-31-05(A)(3)	20 per cent opacity from fugitive sources as a 3-minute average, no visible emissions from the stack, 0.03 pound per hour of particulates, 0.12 ton per year of particulates, and see Section II.A.2.a.
	OAC rule 3745-17-07(B)(1)	see Section II.A.2.b.
	OAC rule 3745-17-08(B), (B)(3)	see Section II.A.2.b.
	OAC rule 3745-21-07(G)(9)(c), (d)	see Section II.A.2.c.

**2. Additional Terms and Conditions**

- 2.a The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.
- 2.b The emissions limitations established pursuant to this applicable rule are less restrictive or equivalent to the emissions limitations established by the best available technology determination of PTI 04-367, as issued on November 26, 1986, and modified by PTI 04-1092.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide

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

**B. Operational Restrictions**

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each month for all emissions units:
  - a. The company identification for each formaldehyde containing material employed.
  - b. The number of gallons of each formaldehyde containing material employed.
  - c. The formaldehyde content of each formaldehyde containing material, in pounds per gallon.
  - d. The formaldehyde emission rate for all formaldehyde containing materials, in pounds per rolling 12-month period.

**D. Reporting Requirements**

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined formaldehyde emissions from all emissions units exceeded 175 pounds as a rolling 12-month summation, and the actual formaldehyde emissions for each such 12-month period.
3. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

1. Emission limitation:

20 per cent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(3).

2. Emission limitation:

no visible emissions from the stack.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

3. Emission limitation:

0.03 pound per hour of particulates and 0.12 ton per year of particulates.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

4. Formulation data or USEPA Method 24 shall be used to determine organic compound contents.

5. Emission limitation:

The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.2. Formulation data shall be used to determine the formaldehyde contents of the materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of Method 18 of 40 CRF Part 60, Appendix A, or approved alternate.

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**Date: Octob**

**Facility ID: 0448011215**

**Emissions Unit ID: P003**

**F. Miscellaneous Requirements**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P005- solvent based paired Cowles mixers No.10 (700 gallons) and No.11 (350 gallons), only one can operate at a time (24,000 lbs/hr) with fabric filtration. modification	OAC rule 3745-31-05(A)(3)	20 per cent opacity from fugitive sources as a 3-minute average, no visible emissions from the stack, 0.06 pound per hour of particulates, 0.28 ton per year of particulates, 66 pounds per hour of organic compounds (OC), 33 tons OC per rolling 12-month period facility-wide, and see Sections II.A.2.a. and 2.b.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B), (B)(3) OAC rule 3745-21-07(G)(9)(d)	see Section II.A.2.c. see Section II.A.2.c. see Section II.A.2.d.

**2. Additional Terms and Conditions**

- 2.a The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.
- 2.b Combined facility wide emissions shall not exceed 10 tons individual, or 25 tons total, of hazardous air pollutants (HAP) in any rolling 12-month period.
- 2.c The emissions limitations established pursuant to this applicable rule are less restrictive or equivalent to the emissions limitations established by the best available technology determination of PTI 04-367, as issued on November 26, 1986, and modified by PTI 04-1092.
- 2.d The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

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

**B. Operational Restrictions**

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day for the mixing operation:
  - a. The company identification for each liquid organic material employed.
  - b. The number of gallons of each liquid organic material employed.
  - c. The organic compound content of each liquid organic material, in pounds per gallon.
  - d. The total organic compound emission rate for all liquid organic materials, in pounds per day.
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly organic compound emission rate for all liquid organic materials, i.e., (d)/(e), in pounds per hour (average).
  - g. The combined facility-wide emissions of organic compounds for all emissions units, in tons as a rolling 12-month summation.

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information for each month for all emissions units:
  - a. The company identification for each HAP containing material employed.
  - b. The number of gallons of each HAP containing material employed.
  - c. The individual HAP content of each HAP containing material, in pounds per gallon.
  - d. The facility-wide summation of each individual HAP emission, and a total of the combined HAP emissions, for all HAP containing materials, in pounds or tons per rolling 12-month period.

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

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the liquid organic materials and photochemically reactive cleanup materials exceeded 66 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined organic compound emissions from all emissions units exceeded 33 tons as a rolling 12-month summation, and the actual organic compound emissions for each such rolling 12-month period.
  - c. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined formaldehyde emissions from all emissions units exceeded 175 pounds per calendar year, and the year-to-date actual formaldehyde emissions for each such month.
  - d. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined facility-wide emissions of any individual HAP

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exceeded 10 tons per 12-month rolling period, and the 12-month summation of any such HAP emissions for each such month.

- e. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined facility-wide emissions of all HAPs exceeded 25 tons per 12-month rolling period, and the 12-month summation of HAP emissions for each such month.
3. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

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

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

1. Emission limitation:

20 per cent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(3).

2. Emission limitation:

no visible emissions from the stack.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

3. Emission limitation:

0.06 pound per hour of particulates and 0.28 ton per year of particulates.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

4. Emission limitation:

39 pounds per hour of organic compounds (OC) and 33 tons per year OC facility-wide.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the liquid organic materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of

OAC rule 3745-17-03(B)(7).

5. Emission limitation:

the combined facility-wide emissions of formaldehyde shall not exceed 175 pounds per year, and the combined facility wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons individual, or 25 tons total, in any 12-month rolling period.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.3. Formulation data shall be used to determine the chemical contents of the materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of Method 18 of 40 CRF Part 60, Appendix A, or approved alternate.

**F. Miscellaneous Requirements**

This permit allows the use of the coatings and cleanup materials specified by the permittee in the permit to install applications of P001, P002, P003, P005, P008, P010, P011, P013, P018, P019, P020 and P021. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compound emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN 3.0 model and a comparison of the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant as a facility wide total:

1. Pollutant: isopropanol

TLV ( $\mu\text{g}/\text{m}^3$ ): 983,000

Maximum Hourly Emission Rate (lbs/hr): 63.21

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 11,100

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 23,400

2. Pollutant: hexane

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TLV ( $\mu\text{g}/\text{m}^3$ ): 176,000

Maximum Hourly Emission Rate (lbs/hr): 19.49

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3,420

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4,190

3. Pollutant: methanol

TLV ( $\mu\text{g}/\text{m}^3$ ): 262,000

Maximum Hourly Emission Rate (lbs/hr): 11.25

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 1,970

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 6,240

4. Pollutant: naphtha

TLV ( $\mu\text{g}/\text{m}^3$ ): 1,420,000

Maximum Hourly Emission Rate (lbs/hr): 20.36

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3,570

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 33,800

As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:

5. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
6. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);
7. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and,

8. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P008- water paste machine, Hockmeyer-1 (200 gallons) mixer (5,000 lbs/hr) with fabric filtration. modification	OAC rule 3745-31-05(A)(3)	20 per cent opacity from fugitive sources as a 3-minute average, no visible emissions from the stack, 0.01 pound per hour of particulates, 0.06 ton per year of particulates, and see Section II.A.2.a.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B), (B)(3) OAC rule 3745-21-07(G)(9)(c), (d)	see Section II.A.2.b. see Section II.A.2.b. see Section II.A.2.c.

**2. Additional Terms and Conditions**

- 2.a** The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.
- 2.b** The emissions limitations established pursuant to this applicable rule are less restrictive or equivalent to the emissions limitations established by the best available technology determination of PTI 04-367, as issued on November 26, 1986, and modified by PTI 04-1092.
- 2.c** The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

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

composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each month for all emissions units:
  - a. The company identification for each formaldehyde containing material employed.
  - b. The number of gallons of each formaldehyde containing material employed.
  - c. The formaldehyde content of each formaldehyde containing material, in pounds per gallon.
  - d. The formaldehyde emission rate for all formaldehyde containing materials, in pounds per rolling 12-month period.

**D. Reporting Requirements**

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined formaldehyde emissions from all emissions units exceeded 175 pounds as a rolling 12-month summation, and the actual formaldehyde emissions for each such 12-month period.
3. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

1. Emission limitation:

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**Emissions Unit ID: P008**

20 per cent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(3).

2. Emission limitation:

no visible emissions from the stack.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

3. Emission limitation:

0.01 pound per hour of particulates and 0.06 ton per year of particulates.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

4. Formulation data or USEPA Method 24 shall be used to determine organic compound contents.

5. Emission limitation:

The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.2. Formulation data shall be used to determine the formaldehyde contents of the materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of Method 18 of 40 CRF Part 60, Appendix A, or approved alternate.

**F. Miscellaneous Requirements**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P011- drum mixer No.15 (55 gallons), Lightning mixer (1,200 lbs/hr) with fabric filtration. modification	OAC rule 3745-31-05(A)(3)	20 per cent opacity from fugitive sources as a 3-minute average, no visible emissions from the stack, 0.003 pound per hour of particulates, 0.01 ton per year of particulates, and see Section II.A.2.a.
	OAC rule 3745-17-07(B)(1)	see Section II.A.2.b.
	OAC rule 3745-17-08(B), (B)(3)	see Section II.A.2.b.
	OAC rule 3745-21-07(G)(9)(c), (d)	see Section II.A.2.c.

**2. Additional Terms and Conditions**

- 2.a The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.
- 2.b The emissions limitations established pursuant to this applicable rule are less restrictive or equivalent to the emissions limitations established by the best available technology determination of PTI 04-367, as issued on November 26, 1986, and modified by PTI 04-1092.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide

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

**B. Operational Restrictions**

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each month for all emissions units:
  - a. The company identification for each formaldehyde containing material employed.
  - b. The number of gallons of each formaldehyde containing material employed.
  - c. The formaldehyde content of each formaldehyde containing material, in pounds per gallon.
  - d. The formaldehyde emission rate for all formaldehyde containing materials, in pounds per rolling 12-month period.

**D. Reporting Requirements**

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined formaldehyde emissions from all emissions units exceeded 175 pounds as a rolling 12-month summation, and the actual formaldehyde emissions for each such 12-month period.

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**Emissions Unit ID: P011**

3. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

1. Emission limitation:  
  
20 per cent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(3).

2. Emission limitation:

no visible emissions from the stack.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

3. Emission limitation:

0.003 pound per hour of particulates and 0.01 ton per year of particulates.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

4. Formulation data or USEPA Method 24 shall be used to determine organic compound contents.

5. Emission limitation:

The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.2. Formulation data shall be used to determine the formaldehyde contents of the materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of Method 18 of 40 CRF Part 60, Appendix A, or approved alternate.

**F. Miscellaneous Requirements**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P013- water paste machine (two 700 gallons), "Small Shar" mixer (15,000 lbs/hr) with fabric filtration. modification	OAC rule 3745-31-05(A)(3)	20 per cent opacity from fugitive sources as a 3-minute average, no visible emissions from the stack, 0.06 pound per hour of particulates, 0.25 ton per year of particulates, and see Section II.A.2.a.
	OAC rule 3745-17-07(B)(1)	see Section II.A.2.b.
	OAC rule 3745-17-08(B), (B)(3)	see Section II.A.2.b.
	OAC rule 3745-21-07(G)(9)(c), (d)	see Section II.A.2.c.

**2. Additional Terms and Conditions**

- 2.a The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.
- 2.b The emissions limitations established pursuant to this applicable rule are less restrictive or equivalent to the emissions limitations established by the best available technology determination of PTI 04-453, as issued on March 9, 1988 and modified by PTI 04-1092.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide

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

**B. Operational Restrictions**

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each month for all emissions units:
  - a. The company identification for each formaldehyde containing material employed.
  - b. The number of gallons of each formaldehyde containing material employed.
  - c. The formaldehyde content of each formaldehyde containing material, in pounds per gallon.
  - d. The formaldehyde emission rate for all formaldehyde containing materials, in pounds per rolling 12-month period.

**D. Reporting Requirements**

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined formaldehyde emissions from all emissions units exceeded 175 pounds as a rolling 12-month summation, and the actual formaldehyde emissions for each such 12-month period.
3. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

1. Emission limitation:

20 per cent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(3).

2. Emission limitation:

no visible emissions from the stack.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

3. Emission limitation:

0.06 pound per hour of particulates and 0.25 ton per year of particulates.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

4. Formulation data or USEPA Method 24 shall be used to determine organic compound contents.

5. Emission limitation:

The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.

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**Date: Octob**

**Facility ID: 0448011215**

**Emissions Unit ID: P013**

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.2. Formulation data shall be used to determine the formaldehyde contents of the materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of Method 18 of 40 CRF Part 60, Appendix A, or approved alternate.

**F. Miscellaneous Requirements**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P018- water paste machine No.5 (600 gallons), "Big Mo", Baker Perkins paste mixer (30,000 lbs/hr) with fabric filtration.	OAC rule 3745-31-05(A)(3)	20 per cent opacity from fugitive sources as a 3-minute average, no visible emissions from the stack, 0.08 pound per hour of particulates, 0.35 ton per year of particulates, and see Section II.A.2.a.
	OAC rule 3745-17-07(B)(1)	see Section II.A.2.b.
	OAC rule 3745-17-08(B), (B)(3)	see Section II.A.2.b.
	OAC rule 3745-21-07(G)(9)(c), (d)	see Section II.A.2.c.

**2. Additional Terms and Conditions**

- 2.a The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.
- 2.b The emissions limitations established pursuant to this applicable rule are less restrictive or equivalent to the emissions limitations established by the best available technology determination of PTI 04-1092.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such

notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each month for all emissions units:
  - a. The company identification for each formaldehyde containing material employed.
  - b. The number of gallons of each formaldehyde containing material employed.
  - c. The formaldehyde content of each formaldehyde containing material, in pounds per gallon.
  - d. The formaldehyde emission rate for all formaldehyde containing materials, in pounds per rolling 12-month period.

**D. Reporting Requirements**

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined formaldehyde emissions from all emissions units exceeded 175 pounds as a rolling 12-month summation, and the actual formaldehyde emissions for each such 12-month period.
3. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the

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**Facility ID: 0448011215**

**Emissions Unit ID: P018**

General Terms and Conditions of this permit.

**E. Testing Requirements**

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

1. Emission limitation:

20 per cent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(3).

2. Emission limitation:

no visible emissions from the stack.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

3. Emission limitation:

0.08 pound per hour of particulates and 0.35 ton per year of particulates.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

4. Formulation data or USEPA Method 24 shall be used to determine organic compound contents.

5. Emission limitation:

The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.2. Formulation data shall be used to determine the formaldehyde contents of the materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of Method 18 of 40 CRF Part 60, Appendix A, or approved alternate.

**F. Miscellaneous Requirements**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P019- Let down station No.9 (1,000 gallons), paste mixer (8,000 lbs/hr) with no control.	OAC rule 3745-31-05(A)(3)	10 pounds per hour of organic compounds (OC), 33 tons OC per rolling 12-month period facility-wide, and see Sections II.A.2.a. and 2.b.
	OAC rule 3745-21-07(G)(9)(d)	see Section II.A.2.c.

**2. Additional Terms and Conditions**

- 2.a The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.
- 2.b Combined facility wide emissions shall not exceed 10 tons individual, or 25 tons total, of hazardous air pollutants (HAP) in any 12-month rolling period.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall

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**Emissions Unit ID: P019**

include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

None

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

1. The permittee shall collect and record the following information for each day for the mixing operation:
  - a. The company identification for each liquid organic material employed.
  - b. The number of gallons of each liquid organic material employed.
  - c. The organic compound content of each liquid organic material, in pounds per gallon.
  - d. The total organic compound emission rate for all liquid organic materials, in pounds per day.
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly organic compound emission rate for all liquid organic materials, i.e., (4)/(5), in pounds per hour (average).
  - g. The combined facility-wide emissions of organic compounds for all emissions units, in tons as a rolling 12-month summation.

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information for each month for all emissions units:
  - a. The company identification for each HAP containing material employed.
  - b. The number of gallons of each HAP containing material employed.
  - c. The individual HAP content of each HAP containing material, in pounds per gallon.
  - d. The facility-wide summation of each individual HAP emission, and a total of the combined HAP emissions, for all HAP containing materials, in pounds or tons per rolling 12-month

period.

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

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the liquid organic materials and photochemically reactive cleanup materials exceeded 10 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined organic compound emissions from all emissions units exceeded 33 tons as a rolling 12-month summation, and the actual organic compound emissions for each such rolling 12-month period.
  - c. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined formaldehyde emissions from all emissions units exceeded 175 pounds per calendar year, and the year-to-date actual formaldehyde emissions for each such month.
  - d. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined facility-wide emissions of any individual HAP exceeded 10 tons per 12-month rolling period, and the 12-month summation of any such HAP emissions for each such month.
  - e. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined facility-wide emissions of all HAPs exceeded 25 tons per 12-month rolling period, and the 12-month summation of HAP emissions for each such month.
2. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

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

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

1. Emission limitation:

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**Emissions Unit ID: P019**

10 pounds per hour of organic compounds (OC) and 33 tons per year OC facility-wide.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the liquid organic materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

2. Emission limitation:

the combined facility-wide emissions of formaldehyde shall not exceed 175 pounds per year, and the combined facility wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons individual, or 25 tons total, in any 12-month rolling period.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.2. Formulation data shall be used to determine the chemical contents of the materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of Method 18 of 40 CRF Part 60, Appendix A, or approved alternate.

**F. Miscellaneous Requirements-**

This permit allows the use of the coatings and cleanup materials specified by the permittee in the permit to install applications of P001, P002, P003, P005, P008, P010, P011, P013, P018, P019, P020, and P021. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compound emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN 3.0 model and a comparison of the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant as a facility wide total:

1. Pollutant: isopropanol

TLV ( $\mu\text{g}/\text{m}^3$ ): 983,000

Maximum Hourly Emission Rate (lbs/hr): 63.21

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 11,100

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 23,400

2. Pollutant: hexane  
  
TLV ( $\mu\text{g}/\text{m}^3$ ): 176,000  
  
Maximum Hourly Emission Rate (lbs/hr): 19.49  
  
Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3,420  
  
MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4,190
3. Pollutant: methanol  
  
TLV ( $\mu\text{g}/\text{m}^3$ ): 262,000  
  
Maximum Hourly Emission Rate (lbs/hr): 11.25  
  
Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 1,970  
  
MAGLC ( $\mu\text{g}/\text{m}^3$ ): 6,240
4. Pollutant: naphtha  
  
TLV ( $\mu\text{g}/\text{m}^3$ ): 1,420,000  
  
Maximum Hourly Emission Rate (lbs/hr): 20.36  
  
Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 3,570  
  
MAGLC ( $\mu\text{g}/\text{m}^3$ ): 33,800

As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:

5. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

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6. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);
7. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and,
8. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P020- "Big Blue" (3,500 gallons), Lost foam refractory coating production line (5,833 lbs/hr) with fabric filtration.	OAC rule 3745-31-05(A)(3)	20 per cent opacity from fugitive sources as a 3-minute average, no visible emissions from the stack, 0.01 pound per hour of particulates, 0.06 ton per year of particulates, and see Section II.A.2.a.
	OAC rule 3745-17-07(B)(1)	see Section II.A.2.b.
	OAC rule 3745-17-08(B), (B)(3)	see Section II.A.2.b.
	OAC rule 3745-21-07(G)(9)(c), (d)	see Section II.A.2.c.

**2. Additional Terms and Conditions**

- 2.a The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.
- 2.b The emissions limitations established pursuant to this applicable rule are less restrictive or equivalent to the emissions limitations established by the best available technology determination of PTI 04-1092.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

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

composition of the material, and the maximum amount to be used, in pounds per hour.

**B. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each month for all emissions units:
  - a. The company identification for each formaldehyde containing material employed.
  - b. The number of gallons of each formaldehyde containing material employed.
  - c. The formaldehyde content of each formaldehyde containing material, in pounds per gallon.
  - d. The formaldehyde emission rate for all formaldehyde containing materials, in pounds per rolling 12-month period.

**D. Reporting Requirements**

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined formaldehyde emissions from all emissions units exceeded 175 pounds as a rolling 12-month summation, and the actual formaldehyde emissions for each such 12-month period.
3. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

**E. Testing Requirements**

**Borden Chemical Inc**  
PTI Application: 04 01002  
**Date: Octob**

**Facility ID: 0448011215**

**Emissions Unit ID: P020**

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

1. Emission limitation:

20 per cent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(3).

2. Emission limitation:

no visible emissions from the stack.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

3. Emission limitation:

0.01 pound per hour of particulates and 0.06 ton per year of particulates.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1.. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

4. Formulation data or USEPA Method 24 shall be used to determine organic compound contents.

5. Emission limitation:

The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.2. Formulation data shall be used to determine the formaldehyde contents of the materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of Method 18 of 40 CRF Part 60, Appendix A, or approved alternate.

**Borden Chem**  
**PTI Applicati**  
**Date: Octok**

**Emissions Unit ID: P020**

**F. Miscellaneous Requirements**

None

**Borden Chemical Inc**  
 PTI Application: **04-01092**  
 Date: **October 12, 2000**

**Facility ID: 0448011215**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P021 - water paste machine "Big Shar" (three 1,000 gallons) mixer (24,000 lbs/hr) with fabric filtration.	OAC rule 3745-31-05(A)(3)	20 per cent opacity from fugitive sources as a 3-minute average, no visible emissions from the stack, 0.04 pound per hour of particulates, 0.18 ton per year of particulates, and see Section II.A.2.a.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B), (B)(3) OAC rule 3745-21-07(G)(9)(c), (d)	see Section II.A.2.b. see Section II.A.2.b. see Section II.A.2.c.

**2. Additional Terms and Conditions**

- 2.a** The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.
- 2.b** The emissions limitations established pursuant to this applicable rule are less restrictive or equivalent to the emissions limitations established by the best available technology determination of PTI 04-367, as issued on November 26, 1986, and modified by PTI 04-1092.
- 2.c** The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

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

**B. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each month for all emissions units:
  - a. The company identification for each formaldehyde containing material employed.
  - b. The number of gallons of each formaldehyde containing material employed.
  - c. The formaldehyde content of each formaldehyde containing material, in pounds per gallon.
  - d. The formaldehyde emission rate for all formaldehyde containing materials, in pounds per rolling 12-month period.

**D. Reporting Requirements**

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined formaldehyde emissions from all emissions units exceeded 175 pounds as a rolling 12-month summation, and the actual formaldehyde emissions for each such 12-month period.
3. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

**E. Testing Requirements**

Compliance with the emission limitations in section II.A.1. of these terms and conditions shall be

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PTI Application: **04-01092**  
Date: **October 12, 2000**

**Facility ID: 0448011215**

determined in accordance with the following methods:

1. Emission limitation:

20 per cent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(3).

2. Emission limitation:

no visible emissions from the stack.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

3. Emission limitation:

0.04 pound per hour of particulates and 0.18 ton per year of particulates.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

4. Formulation data or USEPA Method 24 shall be used to determine organic compound contents.

5. Emission limitation:

The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.

Applicable compliance method:

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PTI Application: **04-01092**  
Date: **October 12, 2000**

**Facility ID: 0448011215**

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.2. Formulation data shall be used to determine the formaldehyde contents of the materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of Method 18 of 40 CFR Part 60, Appendix A, or approved alternate.

**F. Miscellaneous Requirements**

None

**Borden Chemical Inc**  
 PTI Application: **04-01092**  
 Date: **October 12, 2000**

**Facility ID: 0448011215**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

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

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

<b><u>Operations, Property, and/or Equipment</u></b>	<b><u>Applicable Rules/Requirements</u></b>	<b><u>Applicable Emissions Limitations/Control Measures</u></b>
P010 - water paste machine No.2 (200 gallons), J.H. Day paste mixer (10,000 lbs/hr) with fabric filtration. permit modification.	OAC rule 3745-31-05(A)(3)	20 per cent opacity from fugitive sources as a 3-minute average, no visible emissions from the stack, 0.03 pound per hour of particulates, 0.12 ton per year of particulates, and see Section II.A.2.a.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B), (B)(3) OAC rule 3745-21-07(G)(9)(c), (d)	see Section II.A.2.b. see Section II.A.2.b. see Section II.A.2.c.

**2. Additional Terms and Conditions**

- 2.a** The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.
- 2.b** The emissions limitations established pursuant to this applicable rule are less restrictive or equivalent to the emissions limitations established by the best available technology determination of PTI 04-367, as issued on November 26, 1986, and modified by PTI 04-1092.
- 2.c** The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide

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

**B. Operational Restrictions**

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each month for all emissions units:
  - a. The company identification for each formaldehyde containing material employed.
  - b. The number of gallons of each formaldehyde containing material employed.
  - c. The formaldehyde content of each formaldehyde containing material, in pounds per gallon.
  - d. The formaldehyde emission rate for all formaldehyde containing materials, in pounds per rolling 12-month period.

**D. Reporting Requirements**

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the combined formaldehyde emissions from all emissions units exceeded 175 pounds as a rolling 12-month summation, and the actual formaldehyde emissions for each such 12-month period.

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3. The permittee shall submit deviation (excursion) reports in accordance with paragraph 3.b of the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

1. Emission limitation:  
  
20 per cent opacity from fugitive sources as a 3-minute average.

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Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(3).

2. Emission limitation:

no visible emissions from the stack.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1. If required, compliance shall also be demonstrated through visible emissions readings performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

3. Emission limitation:

0.03 pound per hour of particulates and 0.12 ton per year of particulates.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.1. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of OAC rule 3745-17-03(B)(7).

4. Formulation data or USEPA Method 24 shall be used to determine organic compound contents.

5. Emission limitation:

The combined facility-wide emissions of formaldehyde shall not exceed 175 pounds as a rolling 12-month summation.

Applicable compliance method:

compliance shall be demonstrated through monitoring and record keeping requirements of Section II.C.2. Formulation data shall be used to determine the formaldehyde contents of the materials. If required, the permittee shall also demonstrate compliance through stack testing performed in accordance with the methods and procedures of Method 18 of 40 CRF Part 60, Appendix A, or

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approved alternate..

**F. Miscellaneous Requirements**

None