

Facility ID: 0448010074 Issuance type: Final State Permit To Operate

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

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

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

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

Facility ID: 0448010074 Emissions Unit ID: P014 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
high speed disperser with three covered mixing tanks	OAC rule 3745-31-05(A)(3)	0.02 pound of particulate emissions (PE) per hour, 0.10 ton of PE per year, 3.9 pounds of volatile organic compounds (VOC) per hour, 7.3 tons of VOC per year, and see 2.a.
		see 2.b.
	OAC rule 3745-31-05(C)	see 2.c.
	OAC rule 3745-17-07(A)(1)	see 2.d.
	OAC rule 3745-17-11(B)(1)	40 pounds of organic material (OC) per day, and see 2.e.
	OAC rule 3745-21-07(G)(2)	

2. Additional Terms and Conditions

- (a) The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), and the 40 pounds of organic material (OC) per day limitation of OAC rule 3745-21-07(G)(2). The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 tons per year for any individual HAP, and 25 tons per year for any combination of HAPs, as rolling 12-month summations. Visible particulate emissions from any stack serving this emissions unit, shall not exceed 20% opacity as a 6-minute average, except as provided by rule. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The 8 pounds of OC per hour emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

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

C. Monitoring and/or Record Keeping 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 this emissions unit:
 - a. The company identification for each solvent employed.
 - b. The total weight of all solvents employed, in pounds.
 - c. The total VOC emission rate for all solvents employed, in pounds per day, calculated using an emission factor of 0.02 pounds of VOC emitted per pound of solvent employed, i.e., 2% of (b).
 - d. The total number of hours the emissions unit was in operation.

- e. The average hourly VOC emission rate for all solvents, i.e., (c)/(d), in pounds per hour (average).
3. The permittee shall maintain monthly records of the following information for all emissions units in the facility:
- The company identification for each solvent employed.
 - The total weight of each solvent employed, in pounds.
 - The HAP content of each solvent, in pound of individual HAP per pound solvent.
 - The total potential monthly HAP emission rate for all solvents, calculated as a summation of (b) times (c) for each HAP individually and for all HAPs in combination, in pounds per month.
 - The total monthly HAP emissions for all emission units at this facility, in pounds, calculated as the total potential monthly HAP emission rate calculated above multiplied by the emission factor of 0.02 pound of HAP emitted per pound of HAP employed, i.e., calculated as 2% of (d) for each HAP individually and for all HAPs in combination.
 - The rolling, 12-month total HAPS emissions for all emissions units at this facility, in tons, calculated as a summation of the monthly individual and combined HAPs emissions recorded in (e), divided by 2000 pounds per ton.
4. The permit to install for the combined emissions from emissions unit P014 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: toluene
- TLV (mg/m3): 191
- Maximum Hourly Emission Rate (lbs/hr): 3.9
- Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,612
- MAGLC (ug/m3): 4,560
- Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- D. Reporting Requirements**
- 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.
 - The permittee shall submit semi-annual deviation (excursion) reports which include the following information:
 - An identification of each day during which the average hourly VOC emissions from the coatings and

photochemically reactive cleanup materials exceeded 3.9 pounds per hour, and the actual average hourly VOC emissions for each such day.

b. An identification of each day during which the VOC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual VOC emissions for each such day.

c. An identification of each month during which the emissions of HAPs from all emissions units at this facility exceeded 10 tons per year for any individual HAP, and/or 25 tons per year for any combination of HAPs, as rolling 12-month summations, and the actual HAPs emissions for each such period.

3. Except as otherwise specified, the permittee shall submit semi-annual deviation (excursion) reports that identify all exceedances of the VOC and rolling, 12-month HAP limitations. If no deviations occurred, the permittee shall submit a semi-annual report, which states that no deviations occurred during the previous 6-month period. These reports are due by February 15 and August 15 of each year, and shall be submitted to the Toledo Division of Environmental Services.

E. Testing Requirements

1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:

Emission Limitation

3.9 pounds of VOC per hour.

Applicable Compliance Method

Compliance with the hourly emission limitation shall be determined by the record keeping required in condition C.2.e. 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 perform stack testing utilizing the methods and procedures of Method 25 of 40 CFR 60, Appendix A.

Emission Limitation

40 pounds of VOC per day.

Applicable Compliance Method

Compliance with the daily emission limitations shall be determined by the record keeping required in condition C.

Emission Limitation

7.3 tons of VOC per year.

Applicable Compliance Method

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 40 pounds of VOC per day by 365 days per year and divide by 2,000 pounds per ton.

Emission Limitation

The emissions of HAPs from all emissions units at this facility shall not exceed 10 tons per year for any individual HAP, and 25 tons per year for any combination of HAPs, as rolling 12-month summations.

Applicable Compliance Method

Compliance with the rolling 12-month emission limitations shall be determined by the record keeping required in condition C.3.

Emission Limitation

Visible emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method

If required, the permittee shall demonstrate compliance by visible emission readings performed in compliance with the methods and procedures of OAC rule 3745-17-03(B)(1).

Emission Limitation

0.02 pound of PE hour.

Applicable Compliance Method

Compliance may be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (659 pounds per 6 hour batch = 110 pounds per hour) by the capture efficiency (100%), and one minus the control efficiency (1-0.98) and divide the result by 2000 pounds per ton.

If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

Emission Limitation

0.10 ton PE per year.

Applicable Compliance Method

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 0.02 pounds of PE per hour by 8760 hours per year and divide by 2,000 pounds per ton.

F. **Miscellaneous Requirements**

1. None