



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

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

DATE: 1/15/2004

Thermoseal Inc
Robert Leighty
2350 Campbell Rd
Sidney, OH 45365-9501

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of \$ 0 will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

SWDO

IN

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 05-08246 FOR AN AIR CONTAMINANT SOURCE FOR
THERMOSEAL INC

On 1/15/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Thermoseal Inc**, located at **2350 Campbell Rd, Sidney, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-08246:

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

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Phil Hinrichs, Ohio EPA, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402-2911
[(937)285-6357]



**Permit To Install
Terms and Conditions**

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

DRAFT MODIFICATION OF PERMIT TO INSTALL 05-08246

Application Number: **05-08246**
APS Premise Number: **0575010161**
Permit Fee: **\$ To be entered upon final issuance**
Name of Facility: **Thermoseal Inc**
Person to Contact: **Robert Leighty**
Address: **2350 Campbell Rd
Sidney, OH 45365-9501**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2350 Campbell Rd
Sidney, OHIO**

Description of modification:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Thermoseal Inc

Facility ID: **0575010161**

PTI Application: 05-08246

Modification Issued: To be entered upon final issuance

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

If the construction of the proposed source(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 Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

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

Thermoseal Inc

Facility ID: **0575010161**

PTI Application: 05-08246

Modification Issued: To be entered upon final issuance

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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

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

SOURCE OPERATION 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 and regulations.

6

Thermoseal Inc

PTI Application: 05-08246

Modification Issued: To be entered upon final issuance

Facility ID: **0575010161**

Thermoseal Inc
PTI Application: 05-08246
Modification Issued: To be entered upon final issuance

Facility ID: **0575010161**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
-------------------------------	-------------------------------------	--------------------------	---	--

AIR EMISSION SUMMARY

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

Ohio EPA Source Number

P001				P015
	P008		P004	
		P012		
				P013
P011		P002	P005	
	P009			
		P003		

Thermoseal Inc
PTI Application: 05-08246
Modification Issued: To be entered upon final issuance

Facility ID: **0575010161**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
-------------------------------	-------------------------------------	--------------------------	---	--

P016	<u>Source Identification Description</u>			
	2092 lbs/hr Mixer #1			

P017				
	2092 lbs/hr Mixer #2			

P018

Thermoseal Inc
PTI Application: 05-08246
Modification Issued: To be entered upon final issuance

Facility ID: **0575010161**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
2092 lbs/hr Mixer #2				

2092
lbs/hr
Mixer #4

300
lbs/hr
Mixer #5

Thermoseal Inc
PTI Application: 05-08246
Modification Issued: To be entered upon final issuance

Facility ID: **0575010161**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
714 lbs/hr Calendar #1	714 lbs/hr Calendar #4	Lurgi Toluene decanting	BAT <u>Determination</u>	
714 lbs/hr Calendar #2	714 lbs/hr Calendar #5	Croftshaw decantering	toluene	Use of a solvent recovery and filter systems to minimize organic emissions and combined usage and emission limitations
714 lbs/hr Calendar #3	Ethanol distillation	Vulcan toluene decanting		Use of a solvent recovery and filter systems to minimize organic emissions and combined usage and emission limitations.

Thermoseal Inc
PTI Application: 05-08246
Modification Issued: To be entered upon final issuance

Facility ID: **0575010161**

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
Use of a solvent recovery and filter systems to minimize organic emissions and combined usage and emission limitations	Use of a solvent recovery and filter systems to minimize organic emissions and combined usage and emission limitations	limitations Material throughput limitations	and combined usage and emission limitations Use of a solvent recovery and filter systems to minimize organic emissions and combined usage and emission limitations	Applicable Federal & OAC Rules 3745-31-05 3745-21-07 (G)(2) 3745-17-11
Use of a solvent recovery and filter systems to minimize organic emissions and combined usage and emission limitations	Use of a solvent recovery and filter systems to minimize organic emissions and combined usage and emission limitations	Use of a solvent recovery and filter systems to minimize organic emissions and combined usage and emission limitations		3745-31-05 3745-21-07 (G)(2) 3745-17-11
	Use of a solvent recovery and filter systems to minimize organic emissions and combined usage and emission limitations	Use of a solvent recovery and filter systems to minimize organic emissions		

Thermoseal IncFacility ID: **0575010161****PTI Application: 05-08246****Modification Issued: To be entered upon final issuance**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
3745-31- 05	3745-31-05			
3745-21- 07	3745-21-07			
(G)(2)	(G)(2)			
3745-17- 11	3745-17-11			

3745-31-
05
3745-21-
07
(G)(2)
3745-17-
11

Thermoseal Inc
PTI Application: 05-08246
Modification Issued: To be entered upon final issuance

Facility ID: **0575010161**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
3745-31-05	3745-31-05			rolling 365 day period
3745-21-07	3745-21-07			
3745-21-07	(G)(2)			
(G)(2)		3745-31-05		Permit Allowable Mass Emissions and/or Control/Usage Requirements
3745-31-05				21.21 lbs of organic compound (OC) per day;
3745-21-07				0.17 lb of particulate/PM ₁₀ per hour; and the combined emissions from the emissions units located at this facility shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period.
(G)(2)	3745-31-05			
	3745-21-07			
	(G)(2)	3745-31-05		
3745-31-05				21.21 lbs of organic compound (OC) per day;
3745-21-07				0.17 lb of particulate/PM ₁₀ per hour; and the combined emissions from the emissions units located at this facility shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per
(G)(2)	3745-31-05			
	3745-21-09			
	(DD)(17)(a)(i)	3745-31-05		

Thermoseal IncFacility ID: **0575010161****PTI Application: 05-08246****Modification Issued: To be entered upon final issuance**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
21.21 lbs of organic compound (OC) per day; 0.17 lb of particulate/PM ₁₀ per hour; and the combined emissions from the emissions units located at this facility shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period	of organic compound (OC) per day; 0.17 lb of particulate/PM ₁₀ per hour; and the combined emissions from the emissions units located at this facility shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period	(OC) per day; the combined emissions from the emissions units located at this facility shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period	period 19.1 lbs of organic compound (OC) per day; less than 1,000 tons of organic material processed per 12-month period. The combined emissions from the emissions units located at this facility shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period	shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period
58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period	3.05 lbs of organic compound (OC) per day; 0.03 lb of particulate/PM ₁₀ per hour; and the combined emissions from the emissions units located at this facility shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period	722.7 lbs of organic compound (OC) per day; the combined emissions from the emissions units located at this facility shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period	2.9 lbs of organic compound (OC) per day; the combined emissions from the emissions units located at this facility shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period	4.7 lbs of organic compound (OC) per day; the combined emissions from the emissions units located at this facility shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day period
21.21 lbs	722.7 lbs of organic compound	722.7 lbs of organic compound (OC) per day; the combined emissions from the emissions units located at this facility shall not exceed 58.3 tons per rolling 30-day period, and 180 tons per rolling 365 day	2.9 lbs of organic compound (OC) per day; the combined emissions from the emissions units located at this facility	

Thermoseal IncFacility ID: **0575010161****PTI Application: 05-08246****Modification Issued: To be entered upon final issuance**

**SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
OC	180.0
Particulate/PM ₁₀	4.0

RECORD(S) RETENTION AND AVAILABILITY

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

Thermoseal Inc
PTI Application: 05-08246
Modification Issued: To be entered upon final issuance

Facility ID: **0575010161**

REPORTING REQUIREMENTS

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

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

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

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

AIR POLLUTION NUISANCES PROHIBITED

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

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

In order to assure federal enforceability, for the first 365-days after the effective date of this PTI, the cumulative organic compound emissions shall be calculated at the end of each day using the previous 365-day data. This data must be demonstrated to be consistent with the intent of the 1996 mass balance

Thermoseal Inc

Facility ID: **0575010161**

PTI Application: 05-08246

Modification Issued: To be entered upon final issuance

protocol agreement between the Ohio EPA and Thermoseal.

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

In order to assure compliance, this facility shall maintain records that demonstrate compliance with the maintenance and monitoring standards as established in the 1996 mass balance protocol agreement between the Ohio EPA and Thermoseal.

3. The OC content of the gasket mash produced by the mixers, emissions units P001, P011, P008, P009, and P012, shall not exceed 45% by weight, per batch.
4. This facility shall maintain the equipment of emissions units P016, P017, and P018, the solvent condensing and toluene decanter operations, in accordance with good engineering practices and monitor for and repair leaks in accordance with OAC rule 3745-21-09(DD) and 40 CFR Part 60 Subpart VV.
5. Compliance with the daily organic compound emission limitations for each of the emissions units at this facility shall be determined based on the following equations:

For mixers:

$$Ed = Mp * Moc * 1\% * (1 - Cf) * 24$$

For Calenders:

$$Ed = \{[(Mp * Moc) - (Mp * Moc * 0.3\%)] * (1 - Cf)\} * 24$$

For the solvent condensing and toluene decanting operations:

$$Ed = \{[(Mp/2000 * 3.3) + (Mp/2000 * 0.00024)] * (1 - Cf)\} * 24$$

For the ethanol distillation:

$$Ed = \{[(Mp/2000 * 3.3) + (Mp/2000 * 0.00024)] * 24$$

Where:

ED= daily organic compound emissions

Mp= maximum hourly capacity, in pounds

Moc= maximum organic compound content, in percent by weight

Thermoseal Inc

Facility ID: **0575010161**

PTI Application: 05-08246

Modification Issued: To be entered upon final issuance

Cf= the overall capture and control efficiency

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

6. The amount of liquid organic material processed through emissions unit P013, the ethanol distillation, shall not exceed 1,000 tons per rolling 365-day period.

Thermoseal Inc

Facility ID: **0575010161**

PTI Application: 05-08246

Modification Issued: To be entered upon final issuance

7. The permittee shall collect and record the information each day in accordance with the established requirements of the 1996 mass balance protocol agreements between the Ohio EPA and Theromseal. This information shall demonstrate the following:

- A. The calculated organic compound emissions, in tons emitted per the last 30-days;
- B. The calculated organic compound emissions, in tons emitted per the last 365-days; and
- C. The calculated 30-day overall capture and control efficiency of the solvents recovery system of the organic compound emissions.

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

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

- A. All daily records showing that the calculated control VOC rate, 30-day allowable OC emission rate, and/or the 365-day allowable were exceeded; and
- B. All daily records showing that the calculated overall capture and control efficiency of the solvent recovery system is below 90.6%, by weight.

8. The permittee shall maintain daily records that list the following information on the materials mixed in the emissions units P001, P011, P008, P009 and P012:

1. The company identification of the materials being mixed, in each batch;
2. The amount of material mixed, in each batch; and
3. The OC content of the materials being mixed, in percent by weight, in each batch.

The permittee shall notify the Director of any daily record showing that the percent of organic compounds, in percent by weight, exceeds the applicable maximum limit. A copy of such records shall be send to the Director within 45 days after the exceedance occurs.

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

Thermoseal Inc
PTI Application: 05-08246

Facility ID: **0575010161**

Modification Issued: To be entered upon final issuance

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

The permittee shall notify the Director of any daily record showing that the percent of organic compounds, in percent by weight, exceeds the applicable maximum limit. A copy of such records shall be sent to the Director within 45 days after the exceedance occurs.