

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **13-04079**

A. Source Description

All-Foil, Inc., submitted an application for a permit to install for a coating line for thin gauge metal (foil), at 0.002 inches thick.

B. Facility Emissions and Attainment Status

This facility has Title V status due to the potential to emit (PTE) VOC emissions in excess of 100 TPY and HAPs in excess of 10 TPY (single HAP) and 25 TPY (combined HAPs).

C. Source Emissions

At the maximum usage rate for this coating line, this source has a PTE in excess of 100 TPY of VOCs, or 215 tons per year (TPY) and in excess of 10 TPY single HAP (85.9 TPY MEK and 61.4 TPY Toluene) and 25 TPY combined HAPs. This results in Title V applicability. However, this facility has agreed to a Federally Enforceable Permit to Install (Synthetic Minor) that will limit their allowable emissions to under the 100 TPY VOC and 25 TPY/10 TPY HAPs. Allowable emissions will be limited to 43.5 TPY VOC, 9.9 TPY MEK and 9.9 TPY Toluene. Modeling was needed to address Air Toxics. There are no other emissions units located at this facility.

D. Conclusion

Limiting the coating usage for this emissions unit will limit the VOC emissions to 43.5 TPY, MEK to 9.9 TPY and Toluene to under 9.9 TPY. Therefore, All-Foils, Inc. will not be subject to Title V permitting. Air Toxics modeling determined that the allowable limits set forth by this PTI would not produce concentrations of air toxics above the calculated Maximum Acceptable Ground-Level Concentration (MAGLC). Therefore, no additional action is required to comply with air toxics, other than compliance with the terms and conditions of this permit.



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: DRAFT PERMIT TO INSTALL
CUYAHOGA COUNTY
Application No: 13-04079**

DATE: 4/8/2004

All Foils, Incorporated
Mike Fienberg
4597 Van Epps Road
Brooklyn Heights, OH 44131

CERTIFIED MAIL

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

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. 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 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 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 a fee of **\$400** 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

CLAA

PA

CUYAHOGA COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 13-04079 FOR AN AIR CONTAMINANT SOURCE FOR
ALL FOILS, INCORPORATED**

On 4/8/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **All Foils, Incorporated**, located at **4597 Van Epps Road, Brooklyn Heights, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04079:

Foil coating operation -- Z001.

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.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue, Cleveland, OH 44114 [(216)664-2324]



Permit To Install

Issue Date: To be entered upon final issuance

Terms and Conditions

Effective Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 13-04079

Application Number: 13-04079

APS Premise Number: 1318118369

Permit Fee: **To be entered upon final issuance**

Name of Facility: All Foils, Incorporated

Person to Contact: Mike Fienberg

Address: 4597 Van Epps Road
Brooklyn Heights, OH 44131

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

**4597 Van Epps Road
Brooklyn Heights, Ohio**

Description of proposed emissions unit(s):

Foil coating operation -- Z001.

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

Director

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

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 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 Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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

- a. 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).

- b. 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.

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>
VOC (coating)	43.5
MEK (cleanup)	3.36
Single HAP	9.9
Combined HAPs	24.9

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>
K001 - Coating line for thin gauge (foil) metal	OAC rule 3745-31-05(A)(3)	49.2 lbs/hour and 43.5 TPY volatile organic compounds; 3.36 TPY MEK for cleanup The requirements of this rule include compliance with the requirements of OAC rule 3745-21-09(F)
	OAC rule 3745-21-09(F)	2.9 lbs VOC/gal less water and exempt solvents (as a daily average)
	OAC rule 3745-21-09(Y)	Exempt; see Section A.2.a
	OAC rule 3745-35-07 (Synthetic Minor to avoid Title V)	9.9 tpy any single HAP and 24.9 tpy for total combined HAPs See Section B.1, B.2, B.3, B.4 and B.5
	40 CFR 60, Subpart TT	Exempt; see Section A.2.b

2. Additional Terms and Conditions

- 2.a The actual usage of coatings and inks in this *packaging rotogravure printing line* is 36.7 tons per year (TPY) and the potential usage is 91.8 TPY. Printing lines that have a total maximum usage of coatings and inks of less than or equal to one hundred forty-eight TPY are exempt from the requirements of OAC Rule 3745-21-09(Y).
- 2.b This emissions unit is exempt from 40 CFR 60, Subpart TT. The maximum thickness of the thin gauge metal that is coated in this unit is 0.002 inches. *Metal coil surface coating operations*, as defined in 40 CFR 60, Subpart TT, involve a continuous metal strip with a thickness of 0.006 inches or more.

B. Operational Restrictions

1. The maximum annual usage rate in this emissions unit--for coatings CP-1A, CP-7 and T-Ink--shall not exceed 5,000 gallons per year, for each coating, less water and exempt solvents, based upon a rolling, 12-month summation of the coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	420
1-2	840
1-3	1260
1-4	1680
1-5	2100
1-6	2520
1-7	2940
1-8	3360
1-9	3780
1-10	4200
1-11	4620
1-12	5000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage rate limitation shall be based upon a rolling, 12-month summation of the coating usage rates.

2. The maximum annual usage rate in this emissions unit--for coatings CP-2, CP-3, CP-4, CP-5, PSA-1 and A-3S--shall not exceed 2,000 gallons per year, for each coating, less water and exempt solvents, based upon a rolling, 12-month summation of the coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	170
1-2	340
1-3	510
1-4	680
1-5	850
1-6	1020
1-7	1190

1-8	1360
1-9	1530
1-10	1700
1-11	1870
1-12	2000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage rate limitation shall be based upon a rolling, 12-month summation of the coating usage rates.

- The maximum annual usage rate in this emissions unit--for coating CP-9--shall not exceed 500 gallons per year less water and exempt solvents, based upon a rolling, 12-month summation of the coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	42
1-2	84
1-3	126
1-4	168
1-5	210
1-6	252
1-7	294
1-8	336
1-9	378
1-10	420
1-11	462
1-12	500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage rate limitation shall be based upon a rolling, 12-month summation of the coating usage rates.

- The maximum annual usage rate in this emissions unit--for coating S-Ink--shall not exceed 2,500 gallons per year less water and exempt solvents, based upon a rolling, 12-month summation of the coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	210
1-2	420
1-3	630
1-4	840
1-5	1050
1-6	1260
1-7	1470
1-8	1680
1-9	1890
1-10	2100
1-11	2310
1-12	2500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage rate limitation shall be based upon a rolling, 12-month summation of the coating usage rates.

- The maximum annual usage rate in this emissions unit--for cleanup material MEK--shall not exceed 1,000 gallons per year, based upon a rolling, 12-month summation of the cleanup usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cleanup usage levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Cleanup Usage</u>
1	85
1-2	170
1-3	255
1-4	340
1-5	425
1-6	510
1-7	595
1-8	680
1-9	765
1-10	850
1-11	935
1-12	1000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cleanup usage rate limitation shall be based upon a rolling, 12-month summation of the cleanup usage rates.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the volume, in gallons, of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - d. the single HAP content of each coating and cleanup material, in pounds per gallon, as applied;
 - e. the combined HAP content of each coating and cleanup material, in pounds per gallon, as applied;
 - f. the volume, in gallons (excluding water and exempt solvents), of each coating employed;
 - g. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied;
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds (b*c);
 - i. the total single HAP emissions from all coatings and cleanup materials employed, in pounds (b*d);
 - j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds (b*e);
 - k. the average lbs VOC/gal of the coatings used (excluding water and exempt solvents), calculated through the following equation in accordance with OAC rule 3745-21-10(B)(9) for $(C_{VOC,2})_A$

$$(C_{VOC,2})_A = \frac{\sum_{i=1}^n C_{VOC,2i} L_{Ci} (V_{Si} + V_{VOCi})}{\sum_{i=1}^n L_{Ci} (V_{Si} + V_{VOCi})}$$

Figure 1

where:

- $C_{VOC,2}$ = VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents
- A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period t
- L_C = liquid volume of coating employed during time period t , in gallons of coating
- V_S = volume fraction of solids (nonvolatile matter) in coating, in gallon of solids per gallon of coating
- V_{VOC} = $V_{VM} - V_W - V_{ES}$

V_{VM} =	volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating
V_W =	volume fraction of water in coating, in gallon of water per gallon of coating
V_{ES} =	volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating
i =	subscript denoting a specific coating employed during time period t
n =	total number of coatings employed during time period t
t =	time period specified for the weighted average VOC content

2. The permittee shall maintain monthly records of the following information:
 - a. The coating usage rate (less water and exempt solvents) and cleanup usage rate for each month; and,
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating usage rates (less water and exempt solvents) and the cleanup usage rates.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate (less water and exempt solvents) and the cleanup usage rate for each calendar month.

3. The permittee shall collect and record the total VOC, single HAP, and combined HAP emissions from all coatings and cleanup materials employed, in tons, calculated from the daily records in section C.1 above, for this emissions unit for the purpose of determining annual VOC, single HAP, and combined HAP emissions.
4. The permit to install for this emissions unit (K001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's venting 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. 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):

- a. Pollutant: MEK - 3.01 TPY (max)

TLV (mg/m³): 589.8

Maximum Hourly Emission Rate (lbs/hr): 11.5

Predicted 1-Hour Maximum Ground-Level
Concentration (µg/m³): 2,950

MAGLC (µg/m³): 14,042

- b. Pollutant: Ethanol - 2.37 TPY (max)
TLV (mg/m³): 1884.25
Maximum Hourly Emission Rate (lbs/hr): 6.5
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 1,667
MAGLC (µg/m³): 44,860
- c. Pollutant: n-Propyl Acetate - 1.56 TPY (max)
TLV (mg/m³): 835.42
Maximum Hourly Emission Rate (lbs/hr): 8.85
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 2,270
MAGLC (µg/m³): 19,890
- d. Pollutant: Toluene - 4.19 TPY (max)
TLV (mg/m³): 188.4
Maximum Hourly Emission Rate (lbs/hr): 11.0
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 2,822
MAGLC (µg/m³): 4,490
- e. Pollutant: Ethyl Acetate - 4.44 TPY (max)
TLV (mg/m³): 1441.3
Maximum Hourly Emission Rate (lbs/hr): 3.82
Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 980
MAGLC (µg/m³): 34,320
- f. Pollutant: Isopropyl Acetate - 2.43 TPY (max)
TLV (mg/m³): 1044.3

Maximum Hourly Emission Rate (lbs/hr): 2.09

Predicted 1-Hour Maximum Ground-Level
Concentration ($\mu\text{g}/\text{m}^3$): 536

MAGLC ($\mu\text{g}/\text{m}^3$): 24,864

5. Physical changes to or changes in the method of operation of the emissions unit after its installation 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:
 - a. 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;
 - b. 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
 - c. 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.).
6. 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.
7. 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. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and,
 - c. 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

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month usage rate limitations in Section B.1, B.2, B.3, B.4 and B.5 and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative usage limits. The notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.
2. The permittee shall notify the Cleveland Division of Air Quality (CDAQ), in writing of any daily record showing that the daily average VOC content exceeds the allowable limit of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.
3. The permittee shall notify CDAQ in writing if the calculated yearly VOC emission rate from K001 exceeds the allowable yearly emissions limitation of 43.5 tons. The notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.
4. The permittee shall notify CDAQ in writing if the calculated yearly MEK emission rate from K001 exceeds the allowable yearly emissions limitation of 3.36 tons. The notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.
5. The permittee shall notify CDAQ in writing if the calculated yearly single HAP or combined HAPs emission rate from K001 that exceeds the allowable yearly emissions limitation of 9.9 tons and 24.9 tons respectively. The notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation

2.9 lbs VOC/gallon (excluding water and exempt solvents)

Applicable Compliance Method

Compliance with the limitations shall be demonstrated by the monitoring and recordkeeping requirements of section C above.

- b. Emission Limitation

49.2 lbs VOC/hr (from coatings)

Applicable Compliance Method

The pound per hour limit is the maximum potential to emit for this emissions unit

determined from the worst case coating as follows: $8.05 \text{ gals/hr} \times 6.11 \text{ lbs VOC/gal} = 49.2 \text{ lbs VOC/hr}$.

c. Emission Limitation

43.5 tons VOC/year (from coatings)

Applicable Compliance Method

Compliance with the limitations shall be demonstrated by the monitoring and recordkeeping requirements of section C above.

d. Emission Limitation

3.36 TPY MEK from cleanup

Applicable Compliance Method

Compliance with the limitations shall be demonstrated by the monitoring and recordkeeping requirements of section C above.

e. Emission Limitation

9.9 TPY any single HAP (coatings and cleanup)

Applicable Compliance Method

Compliance with the limitations shall be demonstrated by the monitoring and recordkeeping requirements of section C above.

d. Emission Limitation

24.9 TPY total combined HAPs (coatings and cleanup)

Applicable Compliance Method

Compliance with the limitations shall be demonstrated by the monitoring and recordkeeping requirements of section C above.

F. Miscellaneous Requirements

None