



State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL MODIFICATION
FRANKLIN COUNTY
Application No: 01-08401**

CERTIFIED MAIL

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

DATE: 11/1/2001

Franklin International Inc
Michael Desgranges
2020 Bruck St
Columbus, OH 43207

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

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

Environmental Review Appeals Commission
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

CDO



FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-08401

Application Number: 01-08401

APS Premise Number: 0125040070

Permit Fee: \$0

Name of Facility: Franklin International Inc

Person to Contact: Michael Desgranges

Address: 2020 Bruck St
Columbus, OH 43207

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

**2020 Bruck St
Columbus, Ohio**

Description of proposed emissions unit(s):

Four mixers.

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

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 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 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

- 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 thirty (30) 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>
OC	29.2

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>
P006 - Ross 3 mixer, adhesive mixing (modification)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 7.3 tons/yr. There shall be no visible emissions from any stack or outside vent associated with this emission unit or from the room containing the unit, during the addition of solids. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 3745-17-08(B).
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day, unless said discharge has been reduced by at least 85 percent; see section A.2.a.
	OAC rule 3745-17-07(B)(1)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	Reasonable available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.

2. Additional Terms and Conditions

- 2.a** If the permittee applies a control efficiency to calculate emissions from this emissions unit for daily compliance determination and/or annual emission reports, the permittee shall not operate this emission unit without the use of the condenser and it shall be operated and maintained as required in Section B.1.
- 2.b** Reasonably available control measures (RACM) to minimize or eliminate visible emissions of fugitive dust when handling dry raw materials and charging dry raw materials into the mixer shall include, but not be limited to:
- a. appropriate housekeeping measures to prevent fugitive dust from becoming airborne; and
 - b. immediately closing the lid at the completion of adding all batch mixer materials.

B. Operational Restrictions

1. For those batches in which the condenser is used to demonstrate compliance with the allowable limits in Section A.1, the following conditions must be met:
 - a. the average temperature of the chilled water leaving the condenser serving the mix tank shall not exceed 18 degrees Celsius, for any one-hour block of time, during each of the 24 one-hour blocks of time during the day; and
 - b. the permittee shall maintain a continuous temperature monitor at a point where the chilled water is returned from the mixer, and prior to the chiller, to document the outlet temperature of the condenser, for the calculation of its efficiency (Section E.1).
2. The pressure setting of the conservation vents shall be maintained at 2 inches of water, and the permittee shall perform annual inspections to ensure that the vents are clean and unobstructed.
3. The permittee shall not allow any volatile or hazardous material to be stored in open containers and/or handled in a manner that would result in any unnecessary evaporation of the materials.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the following information each day:
 - a. the total number of batches of each adhesive product produced;
 - b. the calculated daily and average hourly OC emission rate, in pounds per day and pounds per hour, summed for all the liquid/volatile components, at each method of loss, by applying the following equations, where each is applicable:

- i. Equation 3-7 from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes", used to calculate the mass emission rate from the displaced gas due to breathing losses:

$$E_r = (Y_i)(V_r)(P_t)(MW) / (R)(T)$$

- ii. Antoine's Equation or Equation 3-8 from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes", with the constants (A, B, & C) found in "Lange's Handbook of Chemistry", to calculate the vapor pressure of each liquid/volatile component:

$$\ln P_i = A - B/(C+T)$$

where:

P_i = vapor pressure of component i (mmHg)

A,B,C = component specific constants

T = temperature of liquid (deg K)

Vapor pressure may also be derived from a reliable source of vapor pressure/temperature tables.

- iii. Equation 3-9 from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes" or Raoul's Law, used to calculate the mole fraction of a component in the vapor:

$$Y_i = P_i / P_t = X_i P_i^* / P_t$$

- iv. Substituting for Y_i from Raoul's Law in Equation 3-7, emissions for each liquid/volatile component in a batch:

$$E_r = (X_i)(V_r)(P_i^*)(MW) / (R)(T)$$

- v. Equation 3-15 (also Equation 3-16, derived from Equation 3-15) from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes", to calculate the moles of gas displaced from temperature increases due to friction; and this multiplied by the molecular weight and the mole fraction of each liquid/volatile component in the mix, to get the pounds of each compound in the gas, displaced in each batch due to heat:

$$E_r = [V \{P_{a1}/T_1 - P_{a2}/T_2\} (Y_i)(MW)] / R$$

where:

E_r = mass emission rate (lbs/batch)
 Y_i = mole fraction of component i in vapor
 X_i = mole fraction of component i in liquid
 V_r = volumetric gas displacement rate (ft³/batch)
 V = volume of vapor in head space (ft³/batch)
 R = ideal gas law constant (10.73 ft³ psia/lb mole deg R)
 T = operating temperature (deg R)
 T_1 = initial temperature in vessel (deg R)
 T_2 = final temperature in vessel (deg R)
 P_i = partial pressure of component i (psia)
 P_i^* = vapor pressure of component i at temperature T (psia)
 P_t = total pressure in the vessel vapor space (psia)
 P_{a1} = initial gas pressure in vessel (psia)
 P_{a2} = final gas pressure in vessel (psia)
MW = molecular weight (lb/lb mole)

- v.i. The control efficiency, when used to demonstrate compliance, calculated as per Part II, Section E.1, using vapor pressures calculated at the condenser vapor inlet and outlet temperatures of record; and
 - c. Daily recordkeeping of the calculated daily and average hourly OC emissions rates shall not be required if documentation is maintained of calculations, performed as required in (b), demonstrate worst-case OC emissions* could not exceed 8 pounds of OC per hour and 40 pounds of OC per day, or documentation that worst-case OC emissions* have been reduced by 85%, calculating the condenser efficiency as required in Part II, Section E.1.
 - * worst case variable conditions (of temperatures, pressures, volume of vapor head space, and concentrations) may be maintained in a single record (rather than maintained daily) for each product or product group to which they could be applied.
 - d. Alternative methods of emissions calculation may be applied, with prior approval from the Ohio EPA, and/or with a change in the US EPA guidance.
2. The permittee shall collect and record the following information on an annual basis for the mixer, for the purpose of documenting and reporting annual emissions:
- a. the total number of batches of each adhesive product or product group produced; and
 - b. the organic compound emissions, in pounds or tons per year, calculated as in Section C.1 above*.

*Products may be grouped by similar product types for the calculations of annual emissions, for compliance demonstration and emissions reports. If the condensers are used to demonstrate compliance, the control efficiency shall be calculated as required in Part II, Section E.1, and shall be dependent on the average vapor inlet and outlet temperatures of the

condenser. Products may be grouped by the seasons of the year in order to segregate and lessen the effects of average annual temperatures; and the highest vapor pressure, representative of the group, shall be used in the calculations of annual emissions.

3. The permit to install for this emissions unit (Ross 3 mixer) 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" pollutants:

Pollutant: Acetone

TLV: 1,188 mg/m³

Maximum Hourly Emission Rate: 8.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 4,103 ug/m³

MAGLC: 28,286 ug/m³

Pollutant: Hexane

TLV: 176 mg/m³

Maximum Hourly Emission Rate: 8.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 4,103 ug/m³

MAGLC: 4,190 ug/m³

Pollutant: Toluene

TLV: 188 mg/m³

Maximum Hourly Emission Rate: 8.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 4,103 ug/m³

MAGLC: 4,476 ug/m³

4. 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:

- 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.).

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. 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 quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the calculated average hourly organic compound emissions exceeded 8 pounds per hour, without reducing these emissions by 85%, and the actual organic compound emissions for each such hour; and

- b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, without reducing these emissions by 85%, and the actual organic compound emissions for each such day.

If the condenser is used to demonstrate compliance, the control efficiency shall be calculated as required in Part II, Section E.1; and these reports shall be submitted as required in Part I, Section A.2.b.

2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

Compliance with the emission limitations in Part II, Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

1. Emission Limitation:

Organic compound emissions shall not exceed 8 lbs/hr and 40 lbs/day, unless said discharge has been reduced by at least 85 percent.

Applicable Compliance Method:

Compliance shall be demonstrated through the calculations and recordkeeping found in Part II, Section C.1. The permittee may demonstrate compliance through the control of the condensers, by using the following equation, which represents the mass balance around the condenser and calculates the mole fraction of VOC in the feed and in the vapor leaving the condenser. If records of these calculations are maintained in the facility records, they need only be performed once for each variation in the condenser inlet and outlet water temperatures for each product, or worst-case product. It shall be assumed that the vapor temperature is 2.5 degrees (Celsius) higher than the outlet water temperature of the condenser.

Mass balance assumptions:

F = liquid/gas feed to the condenser, lb mol

D = gas leaving the condenser, lb mol

W = liquid leaving the condenser, lb mol

z = mole fraction of OC in feed

y = mole fraction of OC in vapor leaving the condenser

x = mole fraction of OC in liquid leaving the condenser

$x = 1$ (assumes that all the liquid condensed is OC)

$F = 100$ lb mol (arbitrarily set to calculate the pound moles of D and W)

$F = D + W$; and therefore $W = F - D$; and substituting for value of "F":

$$W = 100 - D$$

substituting for W in $F(z) = D(y) + W(x)$:

$$100z = Dy + (100 - D)x$$

$$100z = Dy + 100x - Dx$$

$$100z - 100x = Dy - Dx$$

$$100(z - x) = D(y - x)$$

$$D = 100(z - x) / (y - x)$$

The vapor pressures shall be determined using Antoine's equation or chemical vapor pressure tables, at the appropriate condenser inlet and outlet vapor temperatures.

If the liquid is assumed to be 100% OC (condensed), then the mole fractions of OC in the inlet (z) and outlet (y) vapor may be calculated using Raoul's Law, and the efficiency determined for compliance as follows:

efficiency (EF) = in - out / in, or:

$$EF = Fz - Dy / Fz, \text{ or:}$$

$$EF = 100z - [100(z - x) / (y - x)]y / 100z$$

$$z = P1 / 760$$

$$y = P2 / 760$$

$P1$ = vapor pressure of OC, at vapor inlet temperature of condenser

$P2$ = vapor pressure of OC, at vapor outlet temperature of the condenser

If required, the permittee shall demonstrate compliance with the above organic compound emission limitation in accordance with the procedures and methods specified in Method 25 or 25A.

2. Emission Limitation:

Organic compound emissions shall not exceed 7.3 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated through the calculations and recordkeeping found in Part II, Section C.2. The permittee may demonstrate compliance through the use of the condenser control by applying the estimated efficiency, calculated as required in Part II, Section E.1.

3. Emission Limitation:

There shall be no visible emissions from any stack or outside vent associated with this emission unit or from the room containing the unit, during the addition of solids.

Applicable Compliance Method:

If required compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None

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>
P029 - Myers 1 mixer, adhesive mixing	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 7.3 tons/yr. There shall be no visible emissions from any stack or outside vent associated with this emission unit or from the room containing the unit, during the addition of solids.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 3745-17-08(B).
	OAC rule 3745-17-07(B)(1)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day, unless said discharge has been reduced by at least 85 percent; see Section A.2.a.
	OAC rule 3745-17-08(B)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). Reasonable available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.

2. Additional Terms and Conditions

- 2.a** The permittee may demonstrate compliance with OAC rule 3745-21-07(G)(2) by use of a condenser. If these emissions are to exceed the limit from 3745-21-07(G)(2), the condensers shall reduce organic compound emissions by at least 85%. If a condenser is used to demonstrate compliance, the mixer shall not be operated without it.
- 2.b** Reasonably available control measures (RACM) to minimize or eliminate visible emissions of fugitive dust when handling dry raw materials and charging dry raw materials into the mixer shall include, but not be limited to:
- a. appropriate housekeeping measures to prevent fugitive dust from becoming airborne; and
 - b. immediately closing the lid at the completion of adding all batch mixer materials.

B. Operational Restrictions

1. For those batches in which the condenser is used to demonstrate compliance with the allowable limits in Section A.1, the following conditions must be met:
 - a. the average temperature of the chilled water leaving the condenser serving the mix tank shall not exceed 18 degrees Celsius, for any one-hour block of time, during each of the 24 one-hour blocks of time during the day; and
 - b. the permittee shall maintain a continuous temperature monitor at a point where the chilled water is returned from the mixer, and prior to the chiller, to document the outlet temperature of the condenser, for the calculation of its efficiency (Section E.1).
2. The pressure setting of the conservation vents shall be maintained at 2 inches of water, and the permittee shall perform annual inspections to ensure that the vents are clean and unobstructed.
3. The permittee shall not allow any volatile or hazardous material to be stored in open containers and/or handled in a manner that would result in any unnecessary evaporation of the materials.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the following information each day:
 - a. the total number of batches of each adhesive product produced;
 - b. the calculated daily and average hourly OC emission rate, in pounds per day and pounds per hour, summed for all the liquid/volatile components, at each method of loss, by applying the following equations, where each is applicable:

- i. Equation 3-7 from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes", used to calculate the mass emission rate from the displaced gas due to breathing losses:

$$E_r = (Y_i)(V_r)(P_t)(MW) / (R)(T)$$

- ii. Antoine's Equation or Equation 3-8 from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes", with the constants (A, B, & C) found in "Lange's Handbook of Chemistry", to calculate the vapor pressure of each liquid/volatile component:

$$\ln P_i = A - B/(C+T)$$

where:

P_i = vapor pressure of component i (mmHg)

A,B,C = component specific constants

T = temperature of liquid (deg K)

Vapor pressure may also be derived from a reliable source of vapor pressure/temperature tables.

- iii. Equation 3-9 from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes" or Raoult's Law, used to calculate the mole fraction of a component in the vapor:

$$Y_i = P_i / P_t = X_i P_i^* / P_t$$

- iv. Substituting for Y_i from Raoult's Law in Equation 3-7, emissions for each liquid/volatile component in a batch:

$$E_r = (X_i)(V_r)(P_i^*)(MW) / (R)(T)$$

- v. Equation 3-15 (also Equation 3-16, derived from Equation 3-15) from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes", to calculate the moles of gas displaced from temperature increases due to friction; and this multiplied by the molecular weight and the mole fraction of each liquid/volatile component in the mix, to get the pounds of each compound in the gas, displaced in each batch due to heat:

$$E_r = [V \{P_{a1}/T_1 - P_{a2}/T_2\} (Y_i)(MW)] / R$$

where:

E_r = mass emission rate (lbs/batch)

Y_i = mole fraction of component i in vapor

X_i = mole fraction of component i in liquid

V_r = volumetric gas displacement rate (ft³/batch)

V = volume of vapor in head space (ft³/batch)

R = ideal gas law constant (10.73 ft³ psia/lb mole deg R)

T = operating temperature (deg R)

T_1 = initial temperature in vessel (deg R)

T_2 = final temperature in vessel (deg R)

P_i = partial pressure of component i (psia)

P_i^* = vapor pressure of component i at temperature T (psia)

P_t = total pressure in the vessel vapor space (psia)

P_{a1} = initial gas pressure in vessel (psia)

P_{a2} = final gas pressure in vessel (psia)

MW = molecular weight (lb/lb mole)

- v.i. The control efficiency, when used to demonstrate compliance, calculated as per Part II, Section E.1, using vapor pressures calculated at the condenser vapor inlet and outlet temperatures of record; and
 - c. Daily recordkeeping of the calculated daily and average hourly OC emissions rates shall not be required if documentation is maintained of calculations, performed as required in (b), demonstrate worst-case OC emissions* could not exceed 8 pounds of OC per hour and 40 pounds of OC per day, or documentation that worst-case OC emissions* have been reduced by 85%, calculating the condenser efficiency as required in Part II, Section E.1.
 - * worst case variable conditions (of temperatures, pressures, volume of vapor head space, and concentrations) may be maintained in a single record (rather than maintained daily) for each product or product group to which they could be applied.
 - d. Alternative methods of emissions calculation may be applied, with prior approval from the Ohio EPA, and/or with a change in the US EPA guidance.
2. The permittee shall collect and record the following information on an annual basis for the mixer, for the purpose of documenting and reporting annual emissions:
- a. the total number of batches of each adhesive product or product group produced; and
 - b. the organic compound emissions, in pounds or tons per year, calculated as in Section C.1 above*.

*Products may be grouped by similar product types for the calculations of annual emissions, for compliance demonstration and emissions reports. If the condensers are used to demonstrate compliance, the control efficiency shall be calculated as required in Part II, Section E.1, and shall be dependent on the average vapor inlet and outlet temperatures of the condenser. Products may be grouped by the seasons of the year in order to segregate and lessen the effects of average annual temperatures; and the highest vapor pressure, representative of the group, shall be used in the calculations of annual emissions.

3. The permit to install for this emissions unit (Myers 1 mixer) 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" pollutants:

Pollutant: Acetone

TLV: 1,188 mg/m³

Maximum Hourly Emission Rate: 8.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 3,284 ug/m³

MAGLC: 28,286 ug/m³

Pollutant: Hexane

TLV: 176 mg/m³

Maximum Hourly Emission Rate: 8.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 3,284 ug/m³

MAGLC: 4,190 ug/m³

Pollutant: Toluene

TLV: 188 mg/m³

Maximum Hourly Emission Rate: 8.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 3,284 ug/m³

MAGLC: 4,476 ug/m³

4. 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:

- 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.).

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. 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 quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the calculated average hourly organic compound emissions exceeded 8 pounds per hour, without reducing these emissions by 85%, and the actual organic compound emissions for each such hour; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, without reducing these emissions by 85%, and the actual organic compound emissions for each such day.

If the condenser is used to demonstrate compliance, the control efficiency shall be calculated as required in Part II, Section E.1; and these reports shall be submitted as required in Part I, Section A.2.b.

2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

Compliance with the emission limitations in Part II, Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

1. Emission Limitation:

Organic compound emissions shall not exceed 8 lbs/hr and 40 lbs/day, unless said discharge has been reduced by at least 85 percent.

Applicable Compliance Method:

Compliance shall be demonstrated through the calculations and recordkeeping found in Part II, Section C.1. The permittee may demonstrate compliance through the control of the condensers, by using the following equation, which represents the mass balance around the condenser and calculates the mole fraction of VOC in the feed and in the vapor leaving the condenser. If records of these calculations are maintained in the facility records, they need only be performed once for each variation in the condenser inlet and outlet water temperatures for each product, or worst-case product. It shall be assumed that the vapor temperature is 2.5 degrees (Celsius) higher than the outlet water temperature of the condenser.

Mass balance assumptions:

F = liquid/gas feed to the condenser, lb mol

D = gas leaving the condenser, lb mol

W = liquid leaving the condenser, lb mol

z = mole fraction of OC in feed

y = mole fraction of OC in vapor leaving the condenser

x = mole fraction of OC in liquid leaving the condenser

$x = 1$ (assumes that all the liquid condensed is OC)

$F = 100$ lbmol (arbitrarily set to calculate the pound moles of D and W)

$F = D + W$; and therefore $W = F - D$; and substituting for value of "F":

$$W = 100 - D$$

substituting for W in $F(z) = D(y) + W(x)$:

$$100z = Dy + (100 - D)x$$

$$100z = Dy + 100x - Dx$$

$$100z - 100x = Dy - Dx$$

$$100(z - x) = D(y - x)$$

$$D = 100(z - x) / (y - x)$$

The vapor pressures shall be determined using Antoine's equation or chemical vapor pressure tables, at the appropriate condenser inlet and outlet vapor temperatures.

If the liquid is assumed to be 100% OC (condensed), then the mole fractions of OC in the inlet (z) and outlet (y) vapor may be calculated using Raoult's Law, and the efficiency determined for compliance as follows:

efficiency (EF) = in - out / in, or:

$$EF = Fz - Dy / Fz, \text{ or:}$$

$$EF = 100z - [100(z - x) / (y - x)]y / 100z$$

$$z = P1 / 760$$

$$y = P2 / 760$$

P1 = vapor pressure of OC, at vapor inlet temperature of condenser

P2 = vapor pressure of OC, at vapor outlet temperature of the condenser

If required, the permittee shall demonstrate compliance with the above organic compound emission limitation in accordance with the procedures and methods specified in Method 25 or 25A.

2. Emission Limitation:

Organic compound emissions shall not exceed 7.3 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated through the calculations and recordkeeping found in Part II, Section C.2. The permittee may demonstrate compliance through the use of the condenser control by applying the estimated efficiency, calculated as required in Part II, Section E.1.

3. Emission Limitation:

There shall be no visible emissions from any stack or outside vent associated with this emission unit or from the room containing the unit, during the addition of solids.

Applicable Compliance Method:

If required compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None

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>
P030 - Myers 2 mixer, adhesive mixing	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 7.3 tons/yr. There shall be no visible emissions from any stack or outside vent associated with this emission unit or from the room containing the unit, during the addition of solids.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 3745-17-08(B).
	OAC rule 3745-17-07(B)(1)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day, unless said discharge has been reduced by at least 85 percent; see Section A.2.a.
	OAC rule 3745-17-08(B)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). Reasonable available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.

2. Additional Terms and Conditions

- 2.a** The permittee may demonstrate compliance with OAC rule 3745-21-07(G)(2) by use of a condenser. If these emissions are to exceed the limit from 3745-21-07(G)(2), the condensers shall reduce organic compound emissions by at least 85%. If a condenser is used to demonstrate compliance, the mixer shall not be operated without it.
- 2.b** Reasonably available control measures (RACM) to minimize or eliminate visible emissions of fugitive dust when handling dry raw materials and charging dry raw materials into the mixer shall include, but not be limited to:
- a. appropriate housekeeping measures to prevent fugitive dust from becoming airborne; and
 - b. immediately closing the lid at the completion of adding all batch mixer materials.

B. Operational Restrictions

1. For those batches in which the condenser is used to demonstrate compliance with the allowable limits in Section A.1, the following conditions must be met:
 - a. the average temperature of the chilled water leaving the condenser serving the mix tank shall not exceed 18 degrees Celsius, for any one-hour block of time, during each of the 24 one-hour blocks of time during the day; and
 - b. the permittee shall maintain a continuous temperature monitor at a point where the chilled water is returned from the mixer, and prior to the chiller, to document the outlet temperature of the condenser, for the calculation of its efficiency (Section E.1).
2. The pressure setting of the conservation vents shall be maintained at 2 inches of water, and the permittee shall perform annual inspections to ensure that the vents are clean and unobstructed.
3. The permittee shall not allow any volatile or hazardous material to be stored in open containers and/or handled in a manner that would result in any unnecessary evaporation of the materials.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the following information each day:
 - a. the total number of batches of each adhesive product produced;
 - b. the calculated daily and average hourly OC emission rate, in pounds per day and pounds per hour, summed for all the liquid/volatile components, at each method of loss, by applying the following equations, where each is applicable:

- i. Equation 3-7 from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes", used to calculate the mass emission rate from the displaced gas due to breathing losses:

$$E_r = (Y_i)(V_r)(P_t)(MW) / (R)(T)$$

- ii. Antoine's Equation or Equation 3-8 from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes", with the constants (A, B, & C) found in "Lange's Handbook of Chemistry", to calculate the vapor pressure of each liquid/volatile component:

$$\ln P_i = A - B/(C+T)$$

where:

P_i = vapor pressure of component i (mmHg)

A,B,C = component specific constants

T = temperature of liquid (deg K)

Vapor pressure may also be derived from a reliable source of vapor pressure/temperature tables.

- iii. Equation 3-9 from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes" or Raoult's Law, used to calculate the mole fraction of a component in the vapor:

$$Y_i = P_i / P_t = X_i P_i^* / P_t$$

- iv. Substituting for Y_i from Raoult's Law in Equation 3-7, emissions for each liquid/volatile component in a batch:

$$E_r = (X_i)(V_r)(P_i^*)(MW) / (R)(T)$$

- v. Equation 3-15 (also Equation 3-16, derived from Equation 3-15) from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes", to calculate the moles of gas displaced from temperature increases due to friction; and this multiplied by the molecular weight and the mole fraction of each liquid/volatile component in the mix, to get the pounds of each compound in the gas, displaced in each batch due to heat:

$$E_r = [V \{Pa_1/T_1 - Pa_2/T_2\} (Y_i)(MW)] / R$$

where:

E_r = mass emission rate (lbs/batch)
 Y_i = mole fraction of component i in vapor
 X_i = mole fraction of component i in liquid
 V_r = volumetric gas displacement rate (ft³/batch)
 V = volume of vapor in head space (ft³/batch)
 R = ideal gas law constant (10.73 ft³ psia/lbmole deg R)
 T = operating temperature (deg R)
 T_1 = initial temperature in vessel (deg R)
 T_2 = final temperature in vessel (deg R)
 P_i = partial pressure of component i (psia)
 P_i^* = vapor pressure of component i at temperature T (psia)
 P_t = total pressure in the vessel vapor space (psia)
 P_{a1} = initial gas pressure in vessel (psia)
 P_{a2} = final gas pressure in vessel (psia)
 MW = molecular weight (lb/lbmole)

- v.i. The control efficiency, when used to demonstrate compliance, calculated as per Part II, Section E.1, using vapor pressures calculated at the condenser vapor inlet and outlet temperatures of record; and
 - c. Daily recordkeeping of the calculated daily and average hourly OC emissions rates shall not be required if documentation is maintained of calculations, performed as required in (b), demonstrate worst-case OC emissions* could not exceed 8 pounds of OC per hour and 40 pounds of OC per day, or documentation that worst-case OC emissions* have been reduced by 85%, calculating the condenser efficiency as required in Part II, Section E.1.
 - * worst case variable conditions (of temperatures, pressures, volume of vapor head space, and concentrations) may be maintained in a single record (rather than maintained daily) for each product or product group to which they could be applied.
 - d. Alternative methods of emissions calculation may be applied, with prior approval from the Ohio EPA, and/or with a change in the US EPA guidance.
2. The permittee shall collect and record the following information on an annual basis for the mixer, for the purpose of documenting and reporting annual emissions:
- a. the total number of batches of each adhesive product or product group produced; and
 - b. the organic compound emissions, in pounds or tons per year, calculated as in Section C.1 above*.

*Products may be grouped by similar product types for the calculations of annual emissions, for compliance demonstration and emissions reports. If the condensers are used to demonstrate compliance, the control efficiency shall be calculated as required in Part II, Section E.1, and shall be dependent on the average vapor inlet and outlet temperatures of the condenser. Products may be grouped by the seasons of the year in order to segregate and lessen the effects of average annual temperatures; and the highest vapor pressure, representative of the group, shall be used in the calculations of annual emissions.

3. The permit to install for this emissions unit (Myers 2 mixer) 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" pollutants:

Pollutant: Acetone

TLV: 1,188 mg/m³

Maximum Hourly Emission Rate: 8.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 2,908 ug/m³

MAGLC: 28,286 ug/m³

Pollutant: Hexane

TLV: 176 mg/m³

Maximum Hourly Emission Rate: 8.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 2,908 ug/m³

MAGLC: 4,190 ug/m³

Pollutant: Toluene

TLV: 188 mg/m³

Maximum Hourly Emission Rate: 8.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 2,908 ug/m3

MAGLC: 4,476 ug/m3

4. 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 still 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.).

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. 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 quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the calculated average hourly organic compound emissions exceeded 8 pounds per hour, without reducing these emissions by 85%, and the actual organic compound emissions for each such hour; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, without reducing these emissions by 85%, and the actual organic compound emissions for each such day.

If the condenser is used to demonstrate compliance, the control efficiency shall be calculated as required in Part II, Section E.1; and these reports shall be submitted as required in Part I, Section A.2.b.

2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

Compliance with the emission limitations in Part II, Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

1. Emission Limitation:

Organic compound emissions shall not exceed 8 lbs/hr and 40 lbs/day, unless said discharge has been reduced by at least 85 percent.

Applicable Compliance Method:

Compliance shall be demonstrated through the calculations and recordkeeping found in Part II, Section C.1. The permittee may demonstrate compliance through the control of the condensers, by using the following equation, which represents the mass balance around the condenser and calculates the mole fraction of VOC in the feed and in the vapor leaving the condenser. If records of these calculations are maintained in the facility records, they need only be performed once for each variation in the condenser inlet and outlet water temperatures for each product, or worst-case product. It shall be assumed that the vapor temperature is 2.5 degrees (Celsius) higher than the outlet water temperature of the condenser.

Mass balance assumptions:

F = liquid/gas feed to the condenser, lbmol

D = gas leaving the condenser, lbmol

W = liquid leaving the condenser, lbmol

z = mole fraction of OC in feed

y = mole fraction of OC in vapor leaving the condenser

x = mole fraction of OC in liquid leaving the condenser

x = 1 (assumes that all the liquid condensed is OC)

F = 100 lbmol (arbitrarily set to calculate the pound moles of D and W)

F = D + W; and therefore W = F-D; and substituting for value of "F":

$$W = 100 - D$$

substituting for W in $F(z) = D(y) + W(x)$:

$$100z = Dy + (100 - D)x$$

$$100z = Dy + 100x - Dx$$

$$100z - 100x = Dy - Dx$$

$$100(z - x) = D(y - x)$$

$$D = 100(z - x) / (y - x)$$

The vapor pressures shall be determined using Antoine's equation or chemical vapor pressure tables, at the appropriate condenser inlet and outlet vapor temperatures.

If the liquid is assumed to be 100% OC (condensed), then the mole fractions of OC in the inlet (z) and outlet (y) vapor may be calculated using Raoult's Law, and the efficiency determined for compliance as follows:

efficiency (EF) = in - out / in, or:

$$EF = Fz - Dy / Fz, \text{ or:}$$

$$EF = 100z - [100(z - x) / (y - x)]y / 100z$$

$$z = P1 / 760$$

$$y = P2 / 760$$

P1 = vapor pressure of OC, at vapor inlet temperature of condenser

P2 = vapor pressure of OC, at vapor outlet temperature of the condenser

If required, the permittee shall demonstrate compliance with the above organic compound emission limitation in accordance with the procedures and methods specified in Method 25 or 25A.

2. Emission Limitation:

Organic compound emissions shall not exceed 7.3 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated through the calculations and recordkeeping found in Part II, Section C.2. The permittee may demonstrate compliance through the use of the condenser control by applying the estimated efficiency, calculated as required in Part II, Section E.1.

3. Emission Limitation:

There shall be no visible emissions from any stack or outside vent associated with this emission unit or from the room containing the unit, during the addition of solids.

Applicable Compliance Method:

If required compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None

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>
P031 - Ross 1 mixer, adhesive mixing	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 7.3 tons/yr. There shall be no visible emissions from any stack or outside vent associated with this emission unit or from the room containing the unit, during the addition of solids.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 3745-17-08(B).
	OAC rule 3745-17-07(B)(1)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day, unless said discharge has been reduced by at least 85 percent; see Section A.2.a.
	OAC rule 3745-17-08(B)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). Reasonable available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.

2. Additional Terms and Conditions

- 2.a** The permittee may demonstrate compliance with OAC rule 3745-21-07(G)(2) by use of a condenser. If these emissions are to exceed the limit from 3745-21-07(G)(2), the condensers shall reduce organic compound emissions by at least 85%. If a condenser is used to demonstrate compliance, the mixer shall not be operated without it.
- 2.b** Reasonably available control measures (RACM) to minimize or eliminate visible emissions of fugitive dust when handling dry raw materials and charging dry raw materials into the mixer shall include, but not be limited to:
- a. appropriate housekeeping measures to prevent fugitive dust from becoming airborne; and
 - b. immediately closing the lid at the completion of adding all batch mixer materials.

B. Operational Restrictions

1. For those batches in which the condenser is used to demonstrate compliance with the allowable limits in Section A.1, the following conditions must be met:
 - a. the average temperature of the chilled water leaving the condenser serving the mix tank shall not exceed 18 degrees Celsius, for any one-hour block of time, during each of the 24 one-hour blocks of time during the day; and
 - b. the permittee shall maintain a continuous temperature monitor at a point where the chilled water is returned from the mixer, and prior to the chiller, to document the outlet temperature of the condenser, for the calculation of its efficiency (Section E.1).
2. The pressure setting of the conservation vents shall be maintained at 2 inches of water, and the permittee shall perform annual inspections to ensure that the vents are clean and unobstructed.
3. The permittee shall not allow any volatile or hazardous material to be stored in open containers and/or handled in a manner that would result in any unnecessary evaporation of the materials.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the following information each day:
 - a. the total number of batches of each adhesive product produced;
 - b. the calculated daily and average hourly OC emission rate, in pounds per day and pounds per hour, summed for all the liquid/volatile components, at each method of loss, by applying the following equations, where each is applicable:

- i. Equation 3-7 from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes", used to calculate the mass emission rate from the displaced gas due to breathing losses:

$$E_r = (Y_i)(V_r)(P_t)(MW) / (R)(T)$$

- ii. Antoine's Equation or Equation 3-8 from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes", with the constants (A, B, & C) found in "Lange's Handbook of Chemistry", to calculate the vapor pressure of each liquid/volatile component:

$$\ln P_i = A - B/(C+T)$$

where:

P_i = vapor pressure of component i (mmHg)

A,B,C = component specific constants

T = temperature of liquid (deg K)

Vapor pressure may also be derived from a reliable source of vapor pressure/temperature tables.

- iii. Equation 3-9 from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes" or Raoult's Law, used to calculate the mole fraction of a component in the vapor:

$$Y_i = P_i / P_t = X_i P_i^* / P_t$$

- iv. Substituting for Y_i from Raoult's Law in Equation 3-7, emissions for each liquid/volatile component in a batch:

$$E_r = (X_i)(V_r)(P_i^*)(MW) / (R)(T)$$

- v. Equation 3-15 (also Equation 3-16, derived from Equation 3-15) from US EPA Guideline Series "Control of Volatile Organic Compound Emissions from Batch Processes", to calculate the moles of gas displaced from temperature increases due to friction; and this multiplied by the molecular weight and the mole fraction of each liquid/volatile component in the mix, to get the pounds of each compound in the gas, displaced in each batch due to heat:

$$E_r = [V \{P_{a1}/T_1 - P_{a2}/T_2\} (Y_i)(MW)] / R$$

where:

E_r = mass emission rate (lbs/batch)
 Y_i = mole fraction of component i in vapor
 X_i = mole fraction of component i in liquid
 V_r = volumetric gas displacement rate (ft³/batch)
 V = volume of vapor in head space (ft³/batch)
 R = ideal gas law constant (10.73 ft³ psia/lbmole deg R)
 T = operating temperature (deg R)
 T_1 = initial temperature in vessel (deg R)
 T_2 = final temperature in vessel (deg R)
 P_i = partial pressure of component i (psia)
 P_i^* = vapor pressure of component i at temperature T (psia)
 P_t = total pressure in the vessel vapor space (psia)
 P_{a1} = initial gas pressure in vessel (psia)
 P_{a2} = final gas pressure in vessel (psia)
 MW = molecular weight (lb/lbmole)

- v.i. The control efficiency, when used to demonstrate compliance, calculated as per Part II, Section E.1, using vapor pressures calculated at the condenser vapor inlet and outlet temperatures of record; and
 - c. Daily recordkeeping of the calculated daily and average hourly OC emissions rates shall not be required if documentation is maintained of calculations, performed as required in (b), demonstrate worst-case OC emissions* could not exceed 8 pounds of OC per hour and 40 pounds of OC per day, or documentation that worst-case OC emissions* have been reduced by 85%, calculating the condenser efficiency as required in Part II, Section E.1.
 - * worst case variable conditions (of temperatures, pressures, volume of vapor head space, and concentrations) may be maintained in a single record (rather than maintained daily) for each product or product group to which they could be applied.
 - d. Alternative methods of emissions calculation may be applied, with prior approval from the Ohio EPA, and/or with a change in the US EPA guidance.
2. The permittee shall collect and record the following information on an annual basis for the mixer, for the purpose of documenting and reporting annual emissions:
- a. the total number of batches of each adhesive product or product group produced; and
 - b. the organic compound emissions, in pounds or tons per year, calculated as in Section C.1 above*.

*Products may be grouped by similar product types for the calculations of annual emissions, for compliance demonstration and emissions reports. If the condensers are used to demonstrate compliance, the control efficiency shall be calculated as required in Part II, Section E.1, and shall be dependent on the average vapor inlet and outlet temperatures of the condenser. Products may be grouped by the seasons of the year in order to segregate and lessen the effects of average annual temperatures; and the highest vapor pressure, representative of the group, shall be used in the calculations of annual emissions.

3. The permit to install for this emissions unit (Ross 1 mixer) 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" pollutants:

Pollutant: Acetone

TLV: 1,188 mg/m³

Maximum Hourly Emission Rate: 8.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 2,908 ug/m³

MAGLC: 28,286 ug/m³

Pollutant: Hexane

TLV: 176 mg/m³

Maximum Hourly Emission Rate: 8.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 2,908 ug/m³

MAGLC: 4,190 ug/m³

Pollutant: Toluene

TLV: 188 mg/m³

Maximum Hourly Emission Rate: 8.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 2,908 ug/m³

MAGLC: 4,476 ug/m³

4. 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 still 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.).

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. 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 quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the calculated average hourly organic compound emissions exceeded 8 pounds per hour, without reducing these emissions by 85%, and the actual organic compound emissions for each such hour; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, without reducing these emissions by 85%, and the actual organic compound emissions for each such day.

If the condenser is used to demonstrate compliance, the control efficiency shall be calculated as required in Part II, Section E.1; and these reports shall be submitted as required in Part I, Section A.2.b.

2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

Compliance with the emission limitations in Part II, Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

1. Emission Limitation:

Organic compound emissions shall not exceed 8 lbs/hr and 40 lbs/day, unless said discharge has been reduced by at least 85 percent.

Applicable Compliance Method:

Compliance shall be demonstrated through the calculations and recordkeeping found in Part II, Section C.1. The permittee may demonstrate compliance through the control of the condensers, by using the following equation, which represents the mass balance around the condenser and calculates the mole fraction of VOC in the feed and in the vapor leaving the condenser. If records of these calculations are maintained in the facility records, they need only be performed once for each variation in the condenser inlet and outlet water temperatures for each product, or worst-case product. It shall be assumed that the vapor temperature is 2.5 degrees (Celsius) higher than the outlet water temperature of the condenser.

Mass balance assumptions:

F = liquid/gas feed to the condenser, lbmol

D = gas leaving the condenser, lbmol

W = liquid leaving the condenser, lbmol

z = mole fraction of OC in feed

y = mole fraction of OC in vapor leaving the condenser

x = mole fraction of OC in liquid leaving the condenser

x = 1 (assumes that all the liquid condensed is OC)

F = 100 lbmol (arbitrarily set to calculate the pound moles of D and W)

F = D + W; and therefore W = F-D; and substituting for value of "F":

$$W = 100 - D$$

substituting for W in $F(z) = D(y) + W(x)$:

$$100z = Dy + (100 - D)x$$

$$100z = Dy + 100x - Dx$$

$$100z - 100x = Dy - Dx$$

$$100(z - x) = D(y - x)$$

$$D = 100(z - x) / (y - x)$$

The vapor pressures shall be determined using Antoine's equation or chemical vapor pressure tables, at the appropriate condenser inlet and outlet vapor temperatures.

If the liquid is assumed to be 100% OC (condensed), then the mole fractions of OC in the inlet (z) and outlet (y) vapor may be calculated using Raoult's Law, and the efficiency determined for compliance as follows:

efficiency (EF) = in - out / in, or:

$$EF = Fz - Dy / Fz, \text{ or:}$$

$$EF = 100z - [100(z - x) / (y - x)]y / 100z$$

$$z = P1 / 760$$

$$y = P2 / 760$$

P1 = vapor pressure of OC, at vapor inlet temperature of condenser

P2 = vapor pressure of OC, at vapor outlet temperature of the condenser

If required, the permittee shall demonstrate compliance with the above organic compound emission limitation in accordance with the procedures and methods specified in Method 25 or 25A.

2. Emission Limitation:

Organic compound emissions shall not exceed 7.3 tons/yr.

Applicable Compliance Method:

Compliance shall be demonstrated through the calculations and recordkeeping found in Part II, Section C.2. The permittee may demonstrate compliance through the use of the condenser control by applying the estimated efficiency, calculated as required in Part II, Section E.1.

3. Emission Limitation:

There shall be no visible emissions from any stack or outside vent associated with this emission unit or from the room containing the unit, during the addition of solids.

Applicable Compliance Method:

If required compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 01-08401

Facility ID: 0125040070

FACILITY NAME Franklin International Inc

FACILITY DESCRIPTION adhesive production

CITY/TWP Columbus

SIC CODE 2891

SCC CODE 3-01-050-01

EMISSIONS UNIT ID P006

EMISSIONS UNIT DESCRIPTION Ross 3 mixer, adhesive mixing

DATE INSTALLED 6/88

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	8.0	7.3	8.0	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: hexane, acetone, toluene

NEW SOURCE REVIEW FORM B

PTI Number: 01-08401

Facility ID: 0125040070

FACILITY NAME Franklin International Inc

FACILITY DESCRIPTION adhesive production CITY/TWP Columbus

SIC CODE 2891 SCC CODE 3-01-050-01 EMISSIONS UNIT ID P029

EMISSIONS UNIT DESCRIPTION Myers 1 mixer, adhesive mixing

DATE INSTALLED 6/74

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	8.0	7.3	8.0	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: hexane, acetone, toluene

NEW SOURCE REVIEW FORM B

PTI Number: 01-08401

Facility ID: 0125040070

FACILITY NAME Franklin International Inc

FACILITY DESCRIPTION adhesive production CITY/TWP Columbus

SIC CODE 2891 SCC CODE 3-01-050-01 EMISSIONS UNIT ID P030

EMISSIONS UNIT DESCRIPTION Myers 2 mixer, adhesive mixing

DATE INSTALLED 6/77

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	8.0	7.3	8.0	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: hexane, acetone, toluene

NEW SOURCE REVIEW FORM B

PTI Number: 01-08401

Facility ID: 0125040070

FACILITY NAME Franklin International Inc

FACILITY DESCRIPTION adhesive production CITY/TWP Columbus

SIC CODE 2891 SCC CODE 3-01-050-01 EMISSIONS UNIT ID P031

EMISSIONS UNIT DESCRIPTION Ross 1 mixer, adhesive mixing

DATE INSTALLED 6/77

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	8.0	7.3	8.0	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: hexane, acetone, toluene