



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

11/28/07

**RE: Proposed Title V Chapter 3745-77 Permit
02-85-03-0351
Seaman Corporation**

Attn: Stacey Coburn AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Coburn:

The proposed issuance of the Title V permit for Seaman Corporation, has been created in Ohio EPA's State Air Resources System (STARS) on 11/28/07, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: Northeast District Office
File, DAPC PIER



State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 11/28/07

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 02-85-03-0351 to: Seaman Corporation 1000 Venture Blvd. Wooster, OH 44691

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include K001 through K004, P001 through P004, and P005 through P008.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

Ohio Environmental Protection Agency

Chris Korleski
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

- i. The date, place (as defined in the permit), and time of sampling or measurements.
- ii. The date(s) analyses were performed.
- iii. The company or entity that performed the analyses.
- iv. The analytical techniques or methods used.
- v. The results of such analyses.
- vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. 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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter. (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).)

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply

reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable

requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))
- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
 - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

7. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent “modification” or “installation” as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 (i.e., postmarked) quarterly, 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.)

2. 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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. The operation of the control equipment outside of the restrictions established in the Special Terms and Conditions may or may not indicate a mass emission violation. If required by the Ohio EPA, compliance with the mass emission limitations shall be determined by performing concurrent mass emission tests and parameter readings, using US EPA-approved methods and procedures. The results of any required emission tests and parameter readings shall be used in determining whether or not the operation of the control equipment outside of the restrictions specified is indicative of a possible violation of the mass emission limitations.
2. Parameter deviations due to such malfunctions, that comply with the requirements of OAC rule 3745-15-06(B), do not constitute violations of the operational restrictions for the emissions units at this facility.
3. Emission Limitations:

Pursuant to OAC rule 3745-31-05(C), total emissions from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, shall not exceed 9.9 tons per year of any individual hazardous air pollutant (HAP), and 24.9 tons per year of total combined HAP, based upon a rolling, 12-month summation.

4. The maximum coating and cleanup usage from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, shall not cause emissions to exceed 9.9 tons of any individual HAP and 24.9 tons of total combined HAPs per rolling, 12-month period, calculated using the following formulas:

Emissions from K002 and K005:

XX.X tons individual HAP greater than or equal to the SUM for all coatings of:

$(P)(HAP) [1-(\text{capture} \times \text{DRE})] / 2000 \text{ lbs/ton}$

where:

P = usage of coating in pounds;

HAP = individual HAP content of the coating in pounds HAP per pound coating;

capture = the capture efficiency, assumed to be 100% for K002 and K005; and
DRE = destruction removal efficiency of the thermal incinerator for K002 and K005.

Emissions from K001, K003, K004, P002, P003, P005, P006, P007 and P008:

YY.Y tons individual HAP greater than or equal to the SUM for all coatings of:

$(P)(HAP) / 2000 \text{ lbs/ton}$

where:

P = usage of coating in pounds; and

HAP = individual HAP content of the coating in pounds HAP per pound coating.

Emissions from K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined:

9.9 tons of individual HAP = $XX.X + YY.Y$

24.9 tons of total combined HAP = the sum of each individual HAP for all coatings of $(XX.X + YY.Y)$

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)

A. State and Federally Enforceable Section (continued)

5. Monitoring and/or Record keeping Requirements

The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined:

- a. the name and identification number of each coating and cleanup material, as applied;
- b. the number of pounds of each coating and cleanup material employed;
- c. the individual HAP1 content for each HAP of each coating and cleanup material, in pounds of individual HAP per pound of coating, as applied;
- d. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month, i.e., for each HAP the sum of (b) times (c) for each coating and cleanup material divided by 2000;
- e. the rolling, 12-month summation of the emissions of each single HAP from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, for the previous 12-month period, i.e., the summation of (d) in tons per rolling, 12-month period (for K002 and K005 multiply by the control efficiency);
- f. the total combined HAPs1 content for all HAPs of each coating and cleanup material, in pounds of total combined HAPs per pound of coating, as applied;
- g. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month, i.e., the sum of (b) times (f) for each coating and cleanup material divided by 2000; and
- h. the rolling, 12-month summation of the emissions of total combined HAPs from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, for the previous 12-month period, i.e., the summation of (g) in tons per rolling, 12-month period.

1 A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)

6. Reporting Requirements:

The permittee submit quarterly deviation (excursion) reports that identify:

- a. any exceedence of the rolling, 12-month emission limitation for any individual HAP from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, and the actual individual HAP emissions during each such period; and
- b. any exceedence of the rolling, 12-month emission limitation for total combined HAPs from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, and the actual total combined HAPs emissions during each such period.

The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)

7. Emission Testing:

Compliance with the allowable emission limitations in Part II, section A.3 of these terms and conditions shall be determined in accordance with the following methods:

A. State and Federally Enforceable Section (continued)

7.a Emission Limitation:

Total emissions from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, shall not exceed 9.9 tons per year of any individual HAP, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in Part II, section A.5.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

7.b Emission Limitation:

Total emissions from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, shall not exceed 24.9 tons per year of total combined HAP, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in Part II, section A.5.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

- 8.** The Ohio EPA has approved the compliance assurance monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions unit K002. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions unit.

(Authority for term: 40 CFR Part 64)

B. State Only Enforceable Section

- 1.** The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (defined in OAC rule 3745-77-01) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

B001 - 6.28 mmBtu/hr NG boiler;
P001 - Research and development lab;
Z001 - 2800 gal storage tank;
Z002 - Petroleum distillate cold cleaner; and
Z005 - Petroleum distillate cold cleaner.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Line 3 (K001)

Activity Description: Hot melt coating of continuous web of vinyl-coated fabric with PVC or polyurethane dry blend. Line consists of a continuous mixer at the line, extruder and hot melt head. Organic emissions are uncontrolled.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pelletizer. Physical conversion of dry powder PVC or polyurethane mixtures into homogeneous pellets. Line consists of a continuous mixer, extruder, water bath, vacuum dryer, and chopper.	OAC rule 3745-31-05(A)(3) (PTI 02-21973 issued on 5/28/06)	See sections A.I.2.a, A.I.2.b, A.I.2.c and A.I.2.d below.
PVC coating of continuous fabric web discontinued.	OAC rule 3745-21-09(H)	The emission limitation required by this rule is no longer applicable because this emissions unit no longer serves as a vinyl coating line.

2. Additional Terms and Conditions

- 2.a The VOC content of the dry blend employed in this emissions unit shall not exceed 0.003 pound VOC per pound dry blend, as extruded, excluding water and exempt solvents. This is the same as 0.0174 pound VOC per gallon dry blend.
- 2.b The hourly VOC emissions from dry blend shall not exceed 3.3 pounds per hour. The hourly emission limitation is based on the maximum dry blend usage rate of 1100 pounds per hour, as applied, times 0.003 pound VOC per pound dry blend. The hourly VOC emission limitation is based on the emissions unit's potential-to-emit and thus, no hourly record keeping is required.
- 2.c The VOC emissions from all dry blends shall not exceed 14.5 tons per year.
- 2.d The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each dry blend, as extruded;
 - b. the VOC content of each dry blend, in pounds VOC per pound of dry blend, as applied (excluding water and exempt solvents); and
 - c. the number of pounds of each dry blend extruded.

(Authority for term: OAC rules 3745-21-09(B)(3)(j) and 3745-77-07(C)(1) and PTI 02-21973)
2. The permittee shall collect and record the following cleanup material information monthly from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, for the purpose of determining the total annual VOC emissions:
 - a. the name and identification number of each clean up material employed;
 - b. the VOC content of each clean up material, in pounds VOC per pound of clean up material;
 - c. the number of pounds of each cleanup material used less the number of pounds of solvent recovered; and
 - d. the total VOC emissions from clean up material, in pounds per month (SUM of [b times c] for each clean up material).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)
3. The permittee shall collect and record the following information for the purpose of determining the annual summation of VOC emissions from coatings:
 - a. each month, the total VOC emissions from all dry blends, in pounds or tons (the sum of the products resulting from multiplying the VOC content of each material by the throughput for that material); and
 - b. the total annual VOC emissions from all dry blends, in tons (the sum of the monthly VOC emissions for the calendar year and divided by 2000 pounds per ton).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

IV. Reporting Requirements

1. In accordance to the procedure established in the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify any record that indicates the dry blend VOC content exceeded 0.003 lb/lb.

(Authority for term: OAC rules 3745-21-09(B)(3)(m) and 3745-77-07(C)(1), and PTI 02-21973)
2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)
3. The permittee shall submit annual reports that specify the total VOC emissions from cleanup materials from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, in tons as a summation of the monthly records for the calendar year divided by 2000 lbs/ton. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

The VOC content of the dry blend employed in this emissions unit shall not exceed 0.003 pound VOC per pound dry blend, as extruded, excluding water and exempt solvents. This is the same as 0.0174 pound VOC per gallon dry blend.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings.

(Authority for term: OAC rules 3745-21-10(B) and 3745-77-07(C)(1) and PTI 02-21973)

1.b Emission Limitation:

The hourly VOC emissions from dry blend shall not exceed 3.3 pounds per hour.

Applicable Compliance Method:

The hourly emission limitation is based on the maximum dry blend usage rate of 1100 pounds per hour, as applied, times 0.003 pound VOC per pound dry blend. This emission limit reflects the potential to emit of this line with the VOC content restriction therefore record keeping and reporting are not necessary to verify compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.c Emission Limitation:

The VOC emissions from all dry blends shall not exceed 14.5 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.b.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.d Emission Limitation:

The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.

Applicable Compliance Method:

Compliance shall be determined by the summation of the monthly record keeping requirements specified in section A.III.2.d for the calendar year divided by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<p>Pelletizer. Physical conversion of dry powder PVC or polyurethane mixtures into homogeneous pellets. Line consists of a continuous mixer, extruder, water bath, vacuum dryer, and chopper.</p>		
<p>PVC coating of continuous fabric web discontinued.</p>		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
 (Authority for term: OAC rule 3745-77-07(C)(1))

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Line 4 (K002)

Activity Description: Knife over roll coating of continuous web of uncoated or vinyl coated fabric with PVC plastisol, PVC adhesive or urethane adhesive and/or rotogravure coating with acrylic top finish, controlled by a RTO.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Line 4. Knife-over-roll coating of continuous web of uncoated or vinyl coated fabric with PVC plastisol or urethane adhesive and/or rotogravure coating with acrylic top finish. Ovens and two permanent total enclosures surrounding the coating heads are vented to the RTO.	OAC rule 3745-31-05(A)(3) (PTI 02-21973 issued on 5/28/06)	See sections A.I.2.a, A.I.2.b, A.I.2.c, A.I.2.e and A.I.2.h below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-09(G)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).
	OAC rule 3745-21-09(H)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C)	See sections A.I.2.d, A.I.2.f, A.I.2.g and A.I.2.j below.
	40 CFR Part 64 (Compliance Assurance Monitoring)	See sections A.I.2.h, A.I.2.i, A.II.1, A.II.2, A.III.5, A.III.6, A.III.7, A.III.8, A.III.9, A.IV.2 and A.IV.4 below.

2. Additional Terms and Conditions

- 2.a The VOC content of the fabric coatings (PVC adhesives and PVC plastisols) employed in this emissions unit shall not exceed 0.03 pound VOC per pound coating compound, as applied excluding water and exempt solvents. This is the same as 0.303 pound VOC per gallon of adhesive currently employed.
- 2.b The VOC content of the vinyl coatings (top finish and urethane adhesive) employed in this emissions unit shall not exceed 0.9 pound VOC per pound coating compound, as applied, excluding water and exempt solvents. This is the same as 6.57 pounds VOC per gallon of top finish currently employed.

2. Additional Terms and Conditions (continued)

- 2.c** The hourly VOC emissions from coatings shall not exceed 7.6 pounds per hour. The hourly emission limitation is based on the sum of the following multiplied by a control efficiency factor of 0.03 (1-0.97):
- a. maximum fabric coating usage rate of 1100 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 98% factor to account for losses from mixing; and
 - b. maximum vinyl coating usage rate of 250 pounds per hour, as applied, times 0.9 pound VOC per pound coating times 98% factor to account for losses from mixing.
- 2.d** The VOC emissions from all coating applications shall not exceed 8.2 tons per year, as a rolling, 12-month summation.
- 2.e** The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.
- 2.f** The permanent total enclosures (PTEs) shall be designed and operated according to US EPA Method 204. The use of these PTEs, as defined in Reference Method 204, shall ensure 100% capture of all VOC emissions and thus shall be assumed to capture 100% of OC emissions.
- 2.g** The permittee shall employ a thermal oxidizer system to control the VOC emissions from the PTE. The oxidizer system shall have a VOC destruction efficiency of at least 97%, by weight.
- 2.h** The permittee has the option to perform an additional demonstration to show that each PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.
- If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping and reporting requirements specified below to ensure the ongoing integrity of the PTE.
- If the permittee elects not to perform the additional demonstration to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee shall comply with the differential pressure operational restriction, monitoring, record keeping and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.
- 2.i** This emissions unit is a pollutant specific emissions unit for VOC according to 40 CFR Part 64 and has developed a CAM plan.
- 2.j** Emissions from emissions unit K002 shall not exceed 5.6 tons per year of any individual HAP and 5.6 tons per year of total combined HAP, based upon a rolling, 12-month summation.

II. Operational Restrictions

- 1.** The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

(Authority for term: OAC rules 3745-21-09(B)(3)(I) and 3745-77-07(A)(1), PTI 02-21973 and 40 CFR Part 64)

II. Operational Restrictions (continued)

2. The PTE shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device. If it can be demonstrated that there is no leakage between the coating application, the oven, and the control device and that the oven and control device are operated under negative pressure, they do not need to be enclosed.

The PTE shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The PTE shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

- a. any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point;
- b. the total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling;
- c. the direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H₂O);
- d. all access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in "b", shall be closed during routine operations of the process except for the intermittent movement of product and personnel in and out of the enclosure; and
- e. all VOC emissions shall be captured and contained for discharge through the control device.

(Authority for term: OAC rule 3745-77-07(A)(1), PTI 02-21973, 40 CFR Part 51, Appendix M, Method 204 and 40 CFR Part 64)

3. The maximum coating and cleanup usage for this emissions unit shall not cause emissions to exceed 5.6 tons of any individual HAP and 5.6 tons of total combined HAPs per rolling, 12-month period, calculated using the following formula:

Emissions from K002 and K005:

XX.X tons HAP less than or equal to the SUM for all coatings of:

$$(P)(\text{HAP}) [1 - (\text{capture} \times \text{DRE})] / 2000 \text{ lbs/ton}$$

where:

P = usage of coating in pounds;

HAP = HAP content of the coating, in pounds total combined HAP per pound coating;

capture = the capture efficiency, assumed to be 100% for K002 and K005; and

DRE = destruction removal efficiency of the thermal incinerator for K002 and K005.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, in pounds VOC per pound of coating, as applied (excluding water and exempt solvents); and
 - c. the number of pounds of each coating applied, excluding water and exempt solvents.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

(Authority for term: OAC rules 3745-21-09(B)(j) and 3745-77-07(C)(1) and PTI 02-21973)

2. The permittee shall collect and record the following cleanup material information monthly from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, for the purpose of determining the total annual VOC emissions:
 - a. the name and identification number of each cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds VOC per pound of cleanup material;
 - c. the number of pounds of each cleanup material used less the number of pounds of solvent recovered; and
 - d. the total VOC emissions from cleanup material, in pounds per month (sum of [b times c] for each cleanup material).

(Authority for term: OAC rule and 3745-77-07(C)(1) and PTI 02-21973)

3. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of VOC emissions from coatings:
 - a. the total VOC emissions from all coatings, in pounds or tons (the sum of the products resulting from multiplying the VOC content of each material by the usage for that material times 98% emission factor to account for mixing losses); and
 - b. the total VOC emissions from this emissions unit for the previous rolling, 12-month period.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of individual and total combined HAP emissions from coatings and cleanup materials:
 - a. the name and identification number of each clean up material employed;
 - b. the number of pounds of each coating and cleanup material employed;
 - c. the individual HAP¹ content for each HAP of each coating and cleanup material, in pounds of individual HAP per pound of coating, as applied;
 - d. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month, i.e., for each HAP the sum of (b) times (c) for each coating and cleanup material divided by 2000;
 - e. the rolling, 12-month summation of the emissions of each individual HAP from emissions unit K002 for the previous 12-month period, i.e., the summation of (d) in tons per rolling, 12-month period;
 - f. the combined HAPs¹ content for all HAPs of each coating and cleanup material, in pounds of combined HAPs per pound of coating, as applied;
 - g. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month, i.e., the sum of (b) times (f) for each coating and cleanup material divided by 2000; and
 - h. the rolling, 12-month summation of the emissions of total combined HAPs from emissions units K002 combined for the previous 12-month period, i.e., the summation of (g) in tons per rolling, 12-month period.

¹ A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

5. The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee and approved in writing by the Director.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64 and PTI 02-21973)

6. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the combustion temperature. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

(Authority for term: OAC rules 3745-21-09(B)(3)(n) and 3745-77-07(C)(1) and 40 CFR Part 64)

III. Monitoring and/or Record Keeping Requirements (continued)

7. The permittee shall collect and record the following information for each day for the control equipment:
- a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;
 - all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance; and
 - all 3-hour blocks of time during which the average static pressure differential across the permanent total enclosure was less than the 0.007 inch of water column, when the emissions unit was in operation.

(Authority for term: OAC rules 3745-21-09(B)(3)(I) and 3745-77-07(C)(1), PTI 02-21973 and 40 CFR Part 64)

8. Pursuant to 40 CFR 64.3(a)(2), the permittee shall monitor each bypass damper (or valve) located in the exhaust gas capture system between the emissions unit and the air pollution control device and each emergency bypass valve installed at the air pollution control device (if applicable) that allows the exhaust gas to be diverted away from the air pollution control device to atmosphere with the following procedures:
- Within 3 months of the issuance of this permit, install, calibrate, maintain and operate a flow control position indicator that actuates an audible alarm when the exhaust stream is diverted from the control device when the coating operation and associated oven is operating. Any audible alarm shall be immediately investigated, and in the event that the damper has malfunctioned, the process shall immediately begin safe shut down procedures and remain shutdown until repairs are made.
 - Record all instances of audible alarm actuation, the results of the visible inspection, a description of any corrective action and the duration of any control device bypass.
 - The monitoring system shall be inspected at least once every month to ensure that it functions properly. The results of the inspection shall be recorded in a maintenance log.

The CAM plan for monitoring the control efficiency of the thermal incinerator controlling VOC emissions from this emissions unit has been developed for the monitoring of the combustion temperature within the thermal incinerator. The CAM performance indicator, and indicator range, for this temperature requirement is specified in section A.II.1. When the temperature is outside of the indicator range specified in section A.II.1, corrective action (including, but not limited to, an evaluation of the thermal incinerator) will be required. Upon detecting an excursion of the thermal incinerator's temperature indicator range listed in section A.II.1, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1), PTI 02-21973 and 40 CFR Part 64)

9. If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

IV. Reporting Requirements

1. In accordance to the procedures established in the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. any record that indicates the fabric coating (PVC adhesives and PVC plastisols) VOC content exceeded 0.03 lb/lb;
(Authority for term: OAC rule 3745-21-09(B)(3)(m))
 - b. any record that indicates the vinyl coating (top finish and urethane adhesive) VOC content exceeded 0.9 lb/lb;
(Authority for term: OAC rule 3745-21-09(B)(3)(m))
 - c. any monthly record that indicates the rolling, 12-month summation of VOC emissions from coatings exceeded the limit specified above;
 - d. any monthly record that indicates the rolling, 12-month summation of VOC emissions from cleanup material exceeded the limit specified above;
 - e. any exceedence of the rolling, 12-month emission limitation for each individual HAP from emissions units K002, and the actual individual HAP emissions during such period; and
 - f. any exceedence of the rolling, 12-month emission limitation for total combined HAPs from emissions units K002, and the actual total combined HAPs emissions during such period.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)
2. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. any record showing that the pressure drop across the PTE was less than 0.007 inch of water column, as a 3-hour average, when the emissions unit was in operation;
 - b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance; and
 - c. a quarterly summary that includes a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

(Authority for term: OAC rules 3745-21-09(B)(3)(m) and 3745-77-07(C)(1) and PTI 02-21973)
3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)
4. The permittee shall submit quarterly deviation (excursion) reports that identify all excursions (i.e., findings that the bypass monitoring procedure has not been followed, the bypass monitoring system is not operable, or that a required bypass damper or monitoring system inspection has not been conducted) of the Bypass Indication Monitoring in section A.III.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)
5. The permittee shall submit annual reports that specify the total VOC emissions from cleanup materials from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, in tons as a summation of the monthly records for the calendar year divided by 2000 lbs/ton. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements (continued)

6. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

The VOC content of the fabric coatings (PVC adhesives and PVC plastisols) employed in this emissions unit shall not exceed 0.03 pound VOC per pound coating compound, as applied excluding water and exempt solvents. This is the same as 0.303 pound VOC per gallon of adhesive currently employed.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings.

(Authority for term: OAC rules 3745-21-10(B) and 3745-77-07(C)(1) and PTI 02-21973)

- 1.b Emission Limitation:

The VOC content of the vinyl coatings (top finish and urethane adhesive) employed in this emissions unit shall not exceed 0.9 pound VOC per pound coating compound, as applied, excluding water and exempt solvents. This is the same as 6.57 pounds VOC per gallon of top finish currently employed.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings.

(Authority for term: OAC rules 3745-21-10(B) and 3745-77-07(C)(1))

- 1.c Emission Limitation:

The hourly VOC emissions from coatings shall not exceed 7.6 pounds per hour.

Applicable Compliance Method:

This emission limitation reflects the potential to emit of this line with the VOC content restriction and overall control efficiency; therefore, record keeping and reporting are not necessary to verify compliance.

(Authority for term: OAC rule 3745-77-07(C)(1))

- 1.d Emission Limitation:

The VOC emissions from all coating applications shall not exceed 8.2 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.b.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements (continued)

1.e Emission Limitation:

The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.

Applicable Compliance Method:

Compliance shall be demonstrated as a summation of the monthly record keeping requirement specified in section A.III.2.d for the calendar year, and then divided by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.f Emission Limitation:

Emissions from emissions unit K002 shall not exceed 5.6 tons per year of any individual HAP and 5.6 tons per year of total combined HAP, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the formula in section A.II.3 and the record keeping requirements specified in section A.III.4.

(Authority for term: OAC rules 3745-77-07(C)(1))

1.g Emission Limitation:

The permanent total enclosures (PTEs) shall be designed and operated according to US EPA Method 204. The use of these PTEs, as defined in Reference Method 204, shall ensure 100% capture of all VOC emissions and thus shall be assumed to capture 100% of OC emissions.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The PTE was last verified on June 11, 1999. If there is any modification to the PTE or any change in a parameter affecting the PTE, a test shall be conducted within 90 days.
- b. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

V. Testing Requirements (continued)

- c. All tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
- d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- e. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

(Authority for Term: OAC rules 3745-77-07(C)(1) and 3745-21-10(A))

1.h Emission Limitation:

The permittee shall employ a thermal oxidizer system to control the VOC emissions from the PTE. The oxidizer system shall have a VOC destruction efficiency of at least 97%, by weight.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted on a 2.5 year interval with the next required test no later than March 31, 2008.
- b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Method 18, 25, or 25A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

V. Testing Requirements (continued)

- d. All tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- f. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

(Authority for Term: OAC rules 3745-77-07(C)(1) and 3745-21-10(A))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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Line 4. Knife-over-roll coating of continuous web of uncoated or vinyl coated fabric with PVC plastisol or urethane adhesive and/or rotogravure coating with acrylic top finish. Ovens and permanent total enclosures surrounding the coating heads are vented to the RTO.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit K002 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 6.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 104

MAGLC (ug/m3): 4,480

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements (continued)

2. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - 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.).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

3. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Line 5 (K003)

Activity Description: Pad roll coating of continuous web of uncoated fabric with PVC adhesive or knife-over-roll coating of a continuous web of vinyl coated fabric with PVC plastisol. Oven emissions are vented to a RTO.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Line 5 and an oven. Pad roll coating of continuous web of uncoated fabric with PVC plastisol primer or PVC plastisol.	OAC rule 3745-31-05(A)(3) (PTI 02-21973 5/28/06)	See sections A.I.2.a, A.I.2.b, A.I.2.c, A.I.2.d and A.I.2.e below.
	OAC rule 3745-21-09(G)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(H)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The VOC contents of the coatings (adhesives and plastisol) employed in this emissions unit shall not exceed 0.03 pound VOC per pound coating compound, as applied excluding water and exempt solvents. This is the same as 0.303 pound VOC per gallon of adhesive currently employed.
- 2.b The hourly VOC emissions from coatings shall not exceed 29.4 pounds per hour. The hourly emission limitation is based on the maximum coating usage rate of 1000 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 98% factor to account for losses from mixing. The hourly VOC emission limitation is based on the emissions unit's potential-to-emit and thus, no hourly record keeping is required.
- 2.c The VOC emission from all coatings shall not exceed 128.8 tons per year.
- 2.d The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.
- 2.e The regenerative thermal oxidizer shall be used to reduce the visible emissions from the gas oven.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, in pounds VOC per pound of coating, as applied (excluding water and exempt solvents); and
 - c. the number of pounds of each coating applied, excluding water and exempt solvents.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

(Authority for term: OAC rules 3745-21-09(B)(3(j)) and 3745-77-07(C)(1), and PTI 02-21973)

2. The permittee shall collect and record the following cleanup material information monthly from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, for the purpose of determining the total annual VOC emissions:
 - a. the name and identification number of each clean up material employed;
 - b. the VOC content of each clean up material, in pounds VOC per pound of clean up material;
 - c. the number of pounds of each cleanup material used less the number of pounds of solvent recovered; and
 - d. the total VOC emissions from clean up material, in pounds per month (SUM of [b times c] for each clean up material).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

3. The permittee shall collect and record the following information for the purpose of determining the annual summation of VOC emissions from coatings:
 - a. each month, the total VOC emissions from all coatings, in pounds or tons (the sum of the products resulting from multiplying the VOC content of each material by the usage for that material); and
 - b. the total annual VOC emissions from all coatings, in tons (the sum of the monthly VOC emissions for the calendar year and divided by 2000 pounds per ton).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

4. The permittee shall collect and record for each day a log of the downtime for the control device when the gas oven was in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

IV. Reporting Requirements

1. In accordance to the procedure established in the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. any record that indicates the coating VOC content exceeded the limit specified above; and
 - b. a quarterly summary that includes the downtime for the control device when the gas oven was in operation.

(Authority for term: OAC rule 3745-21-09(B)(3)(m) and 3745-77-07(C)(1), and PTI 02-21973)

2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

IV. Reporting Requirements (continued)

3. The permittee shall submit annual reports that specify the total VOC emissions from cleanup materials from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, in tons as a summation of the monthly records for the calendar year divided by 2000 lbs/ton. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

The VOC contents of the coatings (adhesives and plastisol) employed in this emissions unit shall not exceed 0.03 pound VOC per pound coating compound, as applied excluding water and exempt solvents. This is the same as 0.303 pound VOC per gallon of adhesive currently employed.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings.

(Authority for term: OAC rules 3745-21-10(B) and 3745-77-07(C)(1) and PTI 02-21973)

- 1.b Emission Limitation:

The hourly VOC emissions from coatings shall not exceed 29.4 pounds per hour.

Applicable Compliance Method:

The hourly emission limitation is based on the maximum coating usage rate of 1000 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 98% factor to account for losses from mixing. The hourly VOC emission limitation is based on the emissions unit's potential-to-emit and thus, no hourly record keeping is required.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

- 1.c Emission Limitation:

The VOC emission from all coatings shall not exceed 128.8 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.b.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

- 1.d Emission Limitation:

The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.

Applicable Compliance Method:

Compliance shall be determined by the summation of the monthly record keeping requirements specified in section A.III.2.d for the calendar year divided by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

Facility Name: **Seaman Corporation**
Facility ID: **02-85-03-0351**
Emissions Unit: **Coating Line 5 (K003)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Line 5 and an oven. Pad roll coating of continuous web of uncoated fabric with PVC plastisol primer or PVC plastisol.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Laminator Line 8 (K004)

Activity Description: Lamination of a continuous film onto a continuous web of uncoated or vinyl coated fabric, using low solvent adhesive for bonding. Line consists of two roll adhesive applicator and laminating rolls. Organic emissions are uncontrolled.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Line 8 and an IR oven. Lamination of a continuous film onto a continuous web of vinyl coated fabric, using low solvent adhesive for bonding. Line consists of two roll adhesive applicator and laminating rolls.	OAC rule 3745-31-05(A)(3) (PTI 02-21973 issued on 5/28/06)	See sections A.I.2.a, A.I.2.b, A.I.2.c and A.I.2.d below. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart VVV.
	OAC rule 3745-21-09(H)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(G)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, Subpart VVV	See sections A.I.2.e, A.III.4 and A.IV.4 below.

2. Additional Terms and Conditions

- 2.a The VOC contents of the coatings (PVC adhesives and PVC plastisol) employed in this emissions unit shall not exceed 0.03 pound VOC per pound coating compound, as applied excluding water and exempt solvents. This is the same as 0.303 pound VOC per gallon of adhesive currently employed.
- 2.b The hourly VOC emissions from coatings shall not exceed 10.6 pounds per hour. The hourly emission limitation is based on the maximum coating usage rate of 360 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 98% factor to account for losses from mixing. The hourly VOC emission limitation is based on the emissions unit's potential-to-emit and thus, no hourly record keeping is required.
- 2.c The VOC emissions from all coatings shall not exceed 46.4 tons per year.

2. Additional Terms and Conditions (continued)

- 2.d** The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.
- 2.e** While the total amount of VOC used on coating line K004 and any onsite mix preparation equipment used to prepare coatings (P006, P007, and P008 when mixing for K004) is less than 95 Mg (104.7 tons) per 12-month period, this emissions unit is subject only to the record keeping and reporting requirements of sections A.III.4 and A.IV.4. If the amount of VOC used is 95 Mg or greater in any 12-month period, the affected emissions units shall become subject to all of the requirements of 40 CFR Part 60, Subpart VVV. Once an emissions unit has become subject to the requirements of Subpart VVV, it will remain subject to those requirements regardless of changes in annual VOC use.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
- the name and identification number of each coating, as applied;
 - the VOC content of each coating, in pounds VOC per pound of coating, as applied (excluding water and exempt solvents); and
 - the number of pounds of each coating applied, excluding water and exempt solvents.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

(Authority for term: OAC rules 3745-21-09(B)(3)(j) and 3745-77-07(C)(1) and PTI 02-21973)

2. The permittee shall collect and record the following cleanup material information monthly from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, for the purpose of determining the total annual VOC emissions:
- the name and identification number of each cleanup material employed;
 - the VOC content of each cleanup material, in pounds VOC per pound of cleanup material;
 - the number of pounds of each cleanup material used less the number of pounds of solvent recovered; and
 - the total VOC emissions from cleanup material, in pounds per month (sum of [b times c] for each cleanup material).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

3. The permittee shall collect and record the following information for the purpose of determining the annual summation of VOC emissions from coatings:
- each month, the total VOC emissions from all coatings, in pounds or tons (the sum of the products resulting from multiplying the VOC content of each material by the usage for that material); and
 - the total annual VOC emissions from all coatings, in tons (the sum of the monthly VOC emissions for the calendar year and divided by 2000 pounds per ton).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements (continued)

4. To comply with 40 CFR Part 60, Subpart VVV, the permittee shall record semiannually:
 - a. an estimate of projected VOC use in emissions unit K004 and the associated mixers (emissions units P006, P007 and P008, when mixing coating for emissions unit K004); and
 - b. the actual 12-month VOC use in emissions unit K004 and the associated mixers (emissions units P006, P007 and P008, when mixing coating for emissions unit K004).

(Authority for term: OAC rule 3745-77-07(C)(1), PTI 02-21973 and 40 CFR Part 60, Subpart VVV)

IV. Reporting Requirements

1. In accordance to the procedure established in the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify any record that indicates the coating VOC content exceeded 0.03 lb/lb.

(Authority for term: OAC rule 3745-21-09(B)(3)(m) and 3745-77-07(C)(1) and PTI 02-21973)

2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

3. The permittee shall submit annual reports that specify the total VOC emissions from cleanup materials from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, in tons as a summation of the monthly records for the calendar year divided by 2000 lbs/ton. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1))

4. To comply with 40 CFR Part 60, Subpart VVV, the permittee shall:
 - a. report the first semiannual estimate in which projected annual VOC use exceeds 95 Mg/yr; and
 - b. report the first 12-month period in which the actual VOC use exceeds 95 Mg/yr.

(Authority for term: OAC rule 3745-77-07(C)(1), PTI 02-21973 and 40 CFR Part 60, Subpart VVV)

V. Testing Requirements

1. Compliance with the emission limitations in section A.1.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

The VOC contents of the coatings (PVC adhesives and PVC plastisol) employed in this emissions unit shall not exceed 0.03 pound VOC per pound coating compound, as applied excluding water and exempt solvents. This is the same as 0.303 pound VOC per gallon of adhesive currently employed.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings.

(Authority for term: OAC rules 3745-21-10(B) and 3745-77-07(C)(1) and PTI 02-21973)

V. Testing Requirements (continued)

1.b Emission Limitation:

The hourly VOC emissions from coatings shall not exceed 10.6 pounds per hour.

Applicable Compliance Method:

The hourly emission limitation is based on the maximum coating usage rate of 360 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 98% factor to account for losses from mixing. The hourly VOC emission limitation reflects the potential to emit of this emissions unit and, therefore, record keeping and reporting are not necessary to verify compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.c Emission Limitation:

The VOC emissions from all coatings shall not exceed 46.4 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.b.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.d Emission Limitation:

The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.

Applicable Compliance Method:

Compliance shall be determined by the summation of the monthly record keeping requirements specified in section A.III.2.d for the calendar year divided by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Line 8 and an IR oven. Lamination of a continuous film onto a continuous web of vinyl coated fabric, using low solvent adhesive for bonding. Line consists of two roll adhesive applicator and laminating rolls.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Line 9 (K005)

Activity Description: Hot melt coating of continuous web of vinyl-coated fabric with PVC or polyurethane dry blend compounds. Line consists of a continuous mixer and extruder vented to a RTO, and a hot melt head and rolls.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Hot melt coating of continuous web of fabric with PVC or polyurethane dry blend compounds. Line consists of a continuous mixer and extruder vented to a regenerative thermal oxidizer, and a hot melt head and rolls.	OAC rule 3745-31-05(A)(3) (PTI 02-21973 issued on 5/28/06)	See sections A.I.2.a, A.I.2.b, A.I.2.d and A.I.2.g below. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart VVV.
	OAC rule 3745-21-09(H)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	See sections A.I.2.c, A.I.2.e and A.I.2.f below.
	40 CFR Part 60, Subpart VVV	See sections A.I.2.h, A.III.7 and A.IV.5.

2. Additional Terms and Conditions

- 2.a** The volatile organic compounds (VOC) contents of the coatings (dry blend) employed in this emissions unit shall not exceed 0.003 pound VOC per pound coating compound, as applied excluding water and exempt solvents. This is the same as 0.0174 pound VOC per gallon dry blend.
- 2.b** The VOC emissions from coatings shall not exceed 0.306 pound per hour. The hourly emission limitation is based on the product of the maximum fabric coating usage rate of 3400 pounds per hour, as applied, times 0.003 pound VOC per pound coating multiplied by a control efficiency factor of 0.03 (1 - 97%).
- 2.c** The VOC emissions from all coatings shall not exceed 1.3 tons per year.
- 2.d** The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.

2. Additional Terms and Conditions (continued)

- 2.e** The continuous mixer and extruder shall be designed and operated to meet the requirements of a permanent total enclosure (PTE) as defined by USEPA Method 204. The use of this PTE, as defined in Reference Method 204, shall ensure 100% capture of all the VOC emissions and thus shall be assumed to capture 100% of OC emissions.
- 2.f** The permittee shall employ an oxidizer system to control the VOC emissions from the PTE around the continuous mixer. The oxidizer system shall have a VOC destruction efficiency of at least 97%, by weight.
- 2.g** The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee shall comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

- 2.h** While the total amount of VOC used on coating line K005 and any onsite mix preparation equipment used to prepare coatings for K005 is less than 95 Mg (104.7 tons) per 12-month period, this emissions unit is subject only to the record keeping and reporting requirements of sections A.III.7 and A.IV.5. If the amount of VOC used is 95 Mg or greater in any 12-month period, the affected emissions units shall become subject to all of the requirements of 40 CFR Part 60, Subpart VVV. Once an emissions unit has become subject to the requirements of Subpart VVV, it will remain subject to those requirements regardless of changes in annual VOC use.

II. Operational Restrictions

- 1.** The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

(Authority for term: OAC rules 3745-21-09(B)(I) and 3745-77-07(C)(1) and PTI 02-21973)

- 2.** The PTE shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The PTE shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:
- a. any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point;
 - b. the total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling;

II. Operational Restrictions (continued)

- c. the direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H₂O);
- d. all access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in "b", shall be closed during routine operations of the process except for the intermittent movement of product and personnel in and out of the enclosure; and
- e. all VOC emissions shall be captured and contained for discharge through the control device.

(Authority for term: OAC rule 3745-77-07(A)(1), PTI 02-21973, 40 CFR Part 51, Appendix M, Method 204 and 40 CFR Part 64)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, in pounds VOC per pound of coating, as applied (excluding water and exempt solvents); and
 - c. the number of pounds of each coating applied.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.)

(Authority for term: OAC rules 3745-21-09(B)(3)(j) and 3745-77-07(C)(1) and PTI 02-21973)

2. The permittee shall collect and record the following cleanup material information monthly from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, for the purpose of determining the total annual VOC emissions:
 - a. the name and identification number of each cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds VOC per pound of cleanup material;
 - c. the number of pounds of each cleanup material used less the number of pounds of solvent recovered; and
 - d. the total VOC emissions from cleanup material, in pounds per month (sum of [b times c] for each clean up material).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

3. The permittee shall collect and record the following information for the purpose of determining the annual summation of VOC emissions from coatings:
 - a. each month, the total VOC emissions from all coatings, in pounds or tons (the sum of the products resulting from multiplying the VOC content of each material by the usage for that material); and
 - b. the total annual VOC emissions from all coatings, in tons (the sum of the monthly VOC emissions for the calendar year and divided by 2000 pounds per ton).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside the PTE. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee and approved in writing by the Director.

(Authority for term: OAC rules 3745-77-07(C)(1) and PTI 02-21973)

5. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the combustion temperature. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee and approved in writing by the Director.

(Authority for term: OAC rules 3745-21-09(B)(n) and 3745-77-07(C)(1) and PTI 02-21973)

6. The permittee shall collect and record the following information for each day for the control equipment:
- a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation;
 - all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance; and
 - all 3-hour blocks of time during which the average static pressure differential across the building enclosure was less than the 0.007 inch of water column, when the emissions unit was in operation.

(Authority for term: OAC rules 3745-21-09(B)(3)(l) and 3745-77-07(C)(1) and PTI 02-21973)

7. To comply with 40 CFR Part 60, Subpart VVV, the permittee shall record the following information semiannually:
- an estimate of projected VOC use in emissions unit K005 and the associated mixers (P001); and
 - the actual 12-month VOC use in emissions unit K005 and the associated mixers (P001).

(Authority for term: OAC rule 3745-77-07(C)(1), PTI 02-21973 and 40 CFR Part 60, Subpart VVV)

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any record that indicates the coating VOC content exceeded 0.003 lb/lb.

(Authority for term: OAC rules 3745-21-09(B)(3)(m) and 3745-77-07(C)(1) and PTI 02-21973)

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. any record showing that the pressure drop across the building enclosure was less than 0.007 inch of water column, as a 3-hour average, when the emissions unit was in operation;
 - b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance; and
 - c. a quarterly summary which includes a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

(Authority for term: OAC rules 3745-21-09(B)(3)(m) and 3745-77-07(C)(1) and PTI 02-21973)

3. The permittee shall submit annual reports that specify the total VOC emissions from this emission unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

4. The permittee shall submit annual reports that specify the total VOC emissions from cleanup materials from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, in tons as a summation of the monthly records for the calendar year divided by 2000 lbs/ton. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1))

5. To comply with 40 CFR Part 60, Subpart VVV, the permittee shall report:

- a. the first semiannual estimate in which projected annual VOC use exceeds 95 Mg/yr; and
- b. the first 12-month period in which the actual VOC use exceeds 95 Mg/yr.

(Authority for term: OAC rule 3745-77-07(C)(1), PTI 02-21973 and 40 CFR Part 60, Subpart VVV)

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

VOC contents of the coatings (dry blend) employed in this emissions unit shall not exceed 0.003 pound VOC per pound coating compound, as applied excluding water and exempt solvents. This is the same as 0.0174 pound VOC per gallon dry blend.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings.

(Authority for term: OAC rules 3745-21-10(B) and 3745-77-07(C)(1) and PTI 02-21973)

V. Testing Requirements (continued)

1.b Emission Limitation:

The VOC emissions from coatings shall not exceed 0.306 pound per hour. The hourly emission limitation is based on the product of the maximum fabric coating usage rate of 3400 pounds per hour, as applied, times 0.003 pound VOC per pound coating multiplied by a control efficiency factor of 0.03 (1 - 97%).

Applicable Compliance Method:

This emission limit reflects the potential to emit of this line with the VOC content restriction and overall control efficiency; therefore, record keeping and reporting are not necessary to verify compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.c Emission Limitation:

The VOC emissions from all coatings shall not exceed 1.3 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.b.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.d Emission Limitation:

The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.

Applicable Compliance Method:

Compliance shall be demonstrated as a summation of the monthly record keeping requirement specified in section A.III.2.d for the calendar year, and then divided by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.e Emission Limitation:

The continuous mixer and extruder shall be designed and operated to meet the requirements of a permanent total enclosure (PTE) as defined by USEPA Method 204. The use of this PTE, as defined in Reference Method 204, shall ensure 100% capture of all the VOC emissions and thus shall be assumed to capture 100% of OC emissions.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The PTE was last verified on December 5, 2003. If there is any modification to the PTE or any change in a parameter affecting the PTE, a test shall be conducted within 90 days.

b. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

(Authority for Term: OAC rules 3745-77-07(C)(1) and 3745-21-10(C) and PTI 02-21973)

V. Testing Requirements (continued)

All tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

(Authority for Term: OAC rules 3745-77-07(C)(1) and 3745-21-10(A))

1.f Emission Limitation:

The permittee shall employ an oxidizer system to control the VOC emissions from the PTE around the continuous mixer. The oxidizer system shall have a VOC destruction efficiency of at least 97%, by weight.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted on a 2.5 year interval with the next required test no later than March 31, 2008.
- b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Method 18, 25, or 25A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

(Authority for Term: OAC rule 3745-77-07(C)(1) and rule 3745-21-10(C))

V. Testing Requirements (continued)

All tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

(Authority for Term: OAC rules 3745-77-07(C)(1) and 3745-21-10(A))

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Hot melt coating of continuous web of fabric with PVC or polyurethane dry blend compounds. Line consists of a continuous mixer and extruder vented to a regenerative thermal oxidizer, and a hot melt head and rolls.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: New DB mixing (P001)
Activity Description: New dry blend mixer and PVC resin silo

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pneumatic truck unloading of PVC resin into a storage silo with a bin vent controlled by a fabric filter; dry blend mixer and cooler, dry chemical unloading stations, pneumatic conveying system controlled by a 2000 acfm fabric filter.	OAC rule 3745-31-05(A)(3) (PTI 02-16176 as modified on 5/6/03)	See sections A.I.2.a, A.I.2.b, A.I.2.c and A.I.2.d below.
	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
	OAC rule 3745-17-08(B)	The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

2. Additional Terms and Conditions

- 2.a Particulate emissions shall not exceed 0.02 grain per dscf of exhaust gas from either the storage silo vent or the mixing room dust collector.
- 2.b Total particulate emissions from both collectors shall not exceed 0.54 pound per hour and 2.4 tons per year.
- 2.c Visible particulate emissions from the mixing room dust collector exhaust and from the PVC storage silo vent shall not exceed 5% opacity, as a 6-minute average.
- 2.d There shall be no visible particulate emissions except for 1 minute in any hour from any building opening.

II. Operational Restrictions

- 1. The pressure drop across the mixing room dust collector shall be maintained within the manufacturer's recommended range while the emissions unit is in operation, or within the pressure drop range established during the most recent compliance inspection or stack test that determined the emissions unit was in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-16176)
- 2. The collection efficiency of the air pollution capture hoods for this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at all points of capture. The permittee shall maintain all hoods and enclosures in good operating condition.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-16176)
- 3. The PVC storage silo vent shall be controlled by the fabric filter at all times the silo is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-16176)

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the mixing room dust collector while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the dust collector on a weekly basis, when the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16176)
- 2. The permittee shall maintain copies of the record of the weekly pressure drop readings at the facility for a period of at least five years. Those records should be made available for Ohio EPA or their representatives to review during normal working hours.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16176)
- 3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the PVC storage silo vent. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
(Authority for term: OAC rule 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the mixing room dust collector did not comply with the allowable range established in the operational restriction specified above.

All deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16176)

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the PVC storage silo vent and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month periods.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

Particulate emissions shall not exceed 0.02 grain per dscf of exhaust gas from either the storage silo vent or the mixing room dust collector.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1) and PTI 02-16176)

- 1.b Emission Limitation:

Total particulate emissions from the mixing room dust collector exhaust and the PVC storage silo vent duct collector exhaust, combined, shall not exceed 0.54 pound per hour.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by the following equation:

$$PE, \text{ in lb/hr} = (0.02 \text{ gr/dscf}) \times (3,150 \text{ cfm}) \times (60 \text{ min/hr}) \times (\text{lb}/7000 \text{ gr})$$

where:

0.02 gr/dscf = the grain loading factor for the dust collectors; and

3,150 cfm = the total exhaust flow rate from the PVC storage silo vent dust collector and mixing room dust collector.

(Authority for term: OAC rules 3745-77-07(C)(1) and PTI 02-16176)

V. Testing Requirements (continued)

1.c Emission Limitation:

Total particulate emissions from the mixing room dust collector exhaust and the PVC storage silo vent duct collector exhaust, combined, shall not exceed 2.4 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.54 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

(Authority for term: OAC rules 3745-77-07(C)(1) and PTI 02-16176)

1.d Emission Limitation:

Visible particulate emissions from the mixing room dust collector exhaust and from the PVC storage silo vent shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated by performing visible particulate emission observations in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

(Authority for term: OAC rules 3745-77-07(C)(1) and PTI 02-16176)

1.e Emission Limitation:

There shall be no visible particulate emissions except for 1 minute in any hour from any building opening.

Applicable Compliance Method:

Compliance shall be demonstrated by performing visible particulate emission observations in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 22.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16176)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Plastisol mixer (P002)

Activity Description: Cowles, large mixer for the production of PVC plastisol and PVC adhesive for emissions units K002 and K003 (lines 4 and 5), vented to a 2000 cfm Torit dust collector (#2). Organic emissions are uncontrolled.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Cowles, large coating mixer for the production of plastisol or adhesive for coating lines 4 and 5 (K002 and K003). Organic emissions are uncontrolled.	OAC rule 3745-31-05(A)(3) (PTI 02-21973 issued on 5/28/06)	See sections A.I.2.a, A.I.2.b, A.I.2.e and A.I.2.f below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
	OAC rule 3745-17-08(B)	The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
	OAC rule 3745-31-05(C)	See sections A.I.2.c and A.II.4 below.

2. Additional Terms and Conditions

- 2.a The volatile organic compounds (VOC) content of the coating mix shall not exceed 0.03 pound per pound of coating.
- 2.b The hourly VOC emissions from coatings shall not exceed 2.88 pounds per hour. The hourly emission limitation is based on the maximum coating mix rate of 4800 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 2% factor to account for emissions from mixing as described in AP-42. The hourly VOC emission limitation is based on the emissions unit's potential to emit and thus, no hourly record keeping is required.
- 2.c VOC emissions from coating mixing shall not exceed 2.9 tons per rolling, 12-month period.
- 2.d The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.
- 2.e Particulate emissions (PE) from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.03 grain per dry standard cubic foot of exhaust and 0.51 pound per hour from the dust collector.
- 2.f Visible particulate emissions from the dust collector exhaust shall not exceed 0% opacity as a 6-minute average, except for 1 minute during any 60-minute period.

II. Operational Restrictions

- 1. The pressure drop across the dust collector shall be maintained within the manufacturer's recommended range while the emissions unit is in operation, or within the pressure drop range established during the most recent compliance inspection or stack test that determined the emissions unit was in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)
- 2. The collection efficiency of the air pollution capture hoods for this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at all points of capture. The permittee shall maintain all hoods and enclosures in good operating condition.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)
- 3. The mixer shall be covered and controlled by the fabric filter at all times the mixer is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)
- 4. Coating mixed in this emissions unit shall not exceed 4818 tons per rolling, 12-month period, excluding water and exempt solvents. The permittee has existing production records such that there is no need for first year monthly usage limitations.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the mixing room dust collector while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and manuals, with any modifications deemed necessary by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee shall record the pressure drop across the dust collector on a weekly basis, when the source is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)
- 2. The permittee shall maintain copies of the record of the weekly pressure drop readings at the facility for a period of at least five years. Those records should be made available for Ohio EPA or their representatives to review during normal working hours.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following cleanup material information monthly from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, for the purpose of determining the total annual VOC emissions:
- the name and identification number of each cleanup material employed;
 - the VOC content of each cleanup material, in pounds VOC per pound of cleanup material;
 - the number of pounds of each cleanup material used less the number of pounds of solvent recovered; and
 - the total VOC emissions from cleanup material, in pounds per month (sum of [b times c] for each cleanup material).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

4. The permittee shall collect and record the following information monthly:
- the name and identification number of each coating, as applied;
 - the VOC content of each coating, in pounds VOC per pound of coating, as mixed (excluding water and exempt solvents);
 - the number of pounds of each coating mixed, excluding water and exempt solvents; and
 - the rolling, 12-month summation of total coating throughput, in pounds or tons.

Note: The coating information must be for the coatings as employed, including any thinners or additives.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

5. The permittee shall collect and record annually the total VOC emissions from all coatings, in tons (the sum of the products resulting from multiplying the VOC content of each material by the usage for that material times 2% emission factor to account for mixing losses, and then dividing by 2000 pounds per ton).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

IV. Reporting Requirements

1. In accordance to the procedure established in the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify:
- all periods of time during which the pressure drop across the mixing room dust collector did not comply with the allowable range established in the operational restriction specified above; and
 - any monthly record that indicates the rolling, 12-month summation of coating throughput exceeded the limit specified above.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

2. The permittee shall submit annual reports that specify the total VOC emissions from this emission unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

3. The permittee shall submit annual reports that specify the total VOC emissions from cleanup materials from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, in tons as a summation of the monthly records for the calendar year divided by 2000 lbs/ton. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

PE from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.03 grain per dry standard cubic foot of exhaust from the dust collector.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rules 3745-17-03(B) and 3745-77-07(C)(1) and PTI 02-21973)

1.b Emission Limitation:

PE from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.51 pound per hour from the dust collector.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by the following equation:

$$\text{PE, in lb/hr} = (0.03 \text{ gr/dscf}) \times (2,000 \text{ cfm}) \times (60 \text{ min/hr}) \times (\text{lb}/7000 \text{ gr})$$

where:

0.03 gr/dscf = the grain loading factor for the dust collectors; and
2,000 cfm = the total exhaust flow rate from the dust collector.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.c Emission Limitation:

Visible particulate emissions from the dust collector exhaust shall not exceed 0% opacity as a 6-minute average, except for 1 minute during any 60-minute period.

Applicable Compliance Method:

Compliance shall be demonstrated by performing visible particulate emission observations in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.d Emission Limitation:

The VOC content of the coating mix shall not exceed 0.03 pound per pound of coating.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

V. Testing Requirements (continued)

1.e Emission Limitation:

The hourly VOC emissions from coatings shall not exceed 2.88 pounds per hour.

Applicable Compliance Method:

The hourly emission limitation is based on the maximum coating mix rate of 4800 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 2% factor to account for emissions from mixing as described in AP-42. This emission limit reflects the potential to emit of this line with the VOC content restriction therefore record keeping and reporting are not necessary to verify compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.f Emission Limitation:

VOC emissions from coating mixing shall not exceed 2.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.4 and A.III.5.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.g Emission Limitation:

The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.

Applicable Compliance Method:

Compliance shall be demonstrated as a summation of the monthly record keeping requirement specified in section A.III.3.d for the calendar year, and then divided by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Cowles, large coating mixer for the production of plastisol or adhesive for coating lines 4 and 5 (K002 and K003). Organic emissions are uncontrolled.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Plastisol mixer (P003)

Activity Description: Cayuga, large mixer for the production of PVC plastisol and PVC adhesive for emissions units K002 and K003 (lines 4 and 5), vented to a 2000 cfm Torit dust collector (#2). Organic emissions are uncontrolled.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Cayuga, large mixer for the production of plastisol and adhesive for emissions units K002 and K003 (lines 4 and 5). Organic emissions are uncontrolled.	OAC rule 3745-31-05(A)(3) (PTI 02-21973 issued on 5/28/06)	See sections A.I.2.a, A.I.2.b, A.I.2.e and A.I.2.f below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
	OAC rule 3745-17-08(B)	The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
	OAC rule 3745-31-05(C)	See sections A.I.2.c and A.II.4 below.

2. Additional Terms and Conditions

- 2.a The volatile organic compounds (VOC) content of the coating mix shall not exceed 0.03 pound per pound of coating.
- 2.b The hourly VOC emissions from coatings shall not exceed 2.88 pounds per hour. The hourly emission limitation is based on the maximum coating mix rate of 4800 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 2% factor to account for emissions from mixing as described in AP-42. The hourly VOC emission limitation is based on the emissions unit's potential to emit and thus, no hourly record keeping is required.
- 2.c VOC emissions from coating mixing shall not exceed 2.9 tons per rolling, 12-month period.
- 2.d The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.
- 2.e Particulate emissions (PE) from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.03 grain per dry standard cubic foot of exhaust and 0.51 pound per hour from the dust collector.
- 2.f Visible particulate emissions from the dust collector exhaust shall not exceed 0% opacity as a 6-minute average, except for 1 minute during any 60-minute period.

II. Operational Restrictions

- 1. The pressure drop across the dust collector shall be maintained within the manufacturer's recommended range while the emissions unit is in operation, or within the pressure drop range established during the most recent compliance inspection or stack test that determined the emissions unit was in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)
- 2. The collection efficiency of the air pollution capture hoods for this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at all points of capture. The permittee shall maintain all hoods and enclosures in good operating condition.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)
- 3. The mixer shall be covered and controlled by the fabric filter at all times the mixer is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)
- 4. Coating mixed in this emissions unit shall not exceed 4818 tons per rolling, 12-month period, excluding water and exempt solvents. The permittee has existing production records such that there is no need for first year monthly usage limitations.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the mixing room dust collector while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and manuals, with any modifications deemed necessary by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee shall record the pressure drop across the dust collector on a weekly basis, when the source is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)
- 2. The permittee shall maintain copies of the record of the weekly pressure drop readings at the facility for a period of at least five years. Those records should be made available for Ohio EPA or their representatives to review during normal working hours.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following cleanup material information monthly from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, for the purpose of determining the total annual VOC emissions:
- a. the name and identification number of each cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds VOC per pound of cleanup material;
 - c. the number of pounds of each cleanup material used less the number of pounds of solvent recovered; and
 - d. the total VOC emissions from cleanup material, in pounds per month (sum of [b times c] for each cleanup material).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

4. The permittee shall collect and record the following information monthly:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, in pounds VOC per pound of coating, as mixed (excluding water and exempt solvents);
 - c. the number of pounds of each coating mixed, excluding water and exempt solvents; and
 - d. the rolling, 12-month summation of total coating throughput, in pounds or tons.

Note: The coating information must be for the coatings as employed, including any thinners or additives.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

5. The permittee shall collect and record annually the total VOC emissions from all coatings, in tons (the sum of the products resulting from multiplying the VOC content of each material by the usage for that material times 2% emission factor to account for mixing losses, and then dividing by 2000 pounds per ton).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

IV. Reporting Requirements

1. In accordance to the procedure established in the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all periods of time during which the pressure drop across the mixing room dust collector did not comply with the allowable range established in the operational restriction specified above; and
 - b. any monthly record that indicates the rolling, 12-month summation of coating throughput exceeded the limit specified above.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

2. The permittee shall submit annual reports that specify the total VOC emissions from this emission unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

3. The permittee shall submit annual reports that specify the total VOC emissions from cleanup materials from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, in tons as a summation of the monthly records for the calendar year divided by 2000 lbs/ton. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

PE from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.03 grain per dry standard cubic foot of exhaust from the dust collector.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rules 3745-17-03(B) and 3745-77-07(C)(1) and PTI 02-21973)

1.b Emission Limitation:

PE from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.51 pound per hour from the dust collector.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by the following equation:

$$\text{PE, in lb/hr} = (0.03 \text{ gr/dscf}) \times (2,000 \text{ cfm}) \times (60 \text{ min/hr}) \times (\text{lb}/7000 \text{ gr})$$

where:

0.03 gr/dscf = the grain loading factor for the dust collectors; and
2,000 cfm = the total exhaust flow rate from the dust collector.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.c Emission Limitation:

Visible particulate emissions from the dust collector exhaust shall not exceed 0% opacity as a 6-minute average, except for 1 minute during any 60-minute period.

Applicable Compliance Method:

Compliance shall be demonstrated by performing visible particulate emission observations in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.d Emission Limitation:

The VOC content of the coating mix shall not exceed 0.03 pound per pound of coating.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

V. Testing Requirements (continued)

1.e Emission Limitation:

The hourly VOC emissions from coatings shall not exceed 2.88 pounds per hour.

Applicable Compliance Method:

The hourly emission limitation is based on the maximum coating mix rate of 4800 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 2% factor to account for emissions from mixing as described in AP-42. This emission limit reflects the potential to emit of this line with the VOC content restriction therefore record keeping and reporting are not necessary to verify compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.f Emission Limitation:

VOC emissions from coating mixing shall not exceed 2.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.4 and A.III.5.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.g Emission Limitation:

The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.

Applicable Compliance Method:

Compliance shall be demonstrated as a summation of the monthly record keeping requirement specified in section A.III.3.d for the calendar year, and then divided by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Cayuga, large mixer for the production of plastisol and adhesive for emissions units K002 and K003 (lines 4 and 5). Organic emissions are uncontrolled.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Old DB mixing (P004)

Activity Description: Dry blend mixing consisting of two 900 lbs/hr drum mixers vented to a 2000 cfm Torit dust collector (#2).

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Dry blend mixing consisting of two 900 lbs/hr drum mixers vented to a 2000 cfm Torit dust collector (#2).	OAC rule 3745-31-05(A)(3) (PTI 02-16554 as modified on 7/10/03)	See sections A.I.2.a and A.I.2.b below.
	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
	OAC rule 3745-17-08(B)	The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

2. Additional Terms and Conditions

- Visible particulate emissions from the dust collector controlling the mixers shall not exceed 0% opacity as a 6-minute average, except for 1 minute during any 60-minute period.
- Particulate emissions (PE) from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.03 grain per dry standard cubic foot of exhaust and 0.51 pound per hour from the dust collector.

II. Operational Restrictions

1. The pressure drop across the dust collector shall be maintained within the manufacturer's recommended range while the emissions unit is in operation, or within the pressure drop range established during the most recent compliance inspection or stack test that determined the emissions unit was in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-16554)
2. The collection efficiency of the air pollution capture hoods for this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at all points of capture. The permittee shall maintain all hoods and enclosures in good operating condition.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-16554)
3. The mixers shall be covered and controlled by the fabric filter at all times the mixer is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-16554)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the mixing room dust collector while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee and approved in writing by the Director. The permittee shall record the pressure drop across the dust collector on a weekly basis, when the source is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16554)
2. The permittee shall maintain copies of the record of the weekly pressure drop readings at the facility for a period of at least five years. Those records should be made available for Ohio EPA or their representatives to review during normal working hours.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16554)

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the mixing room dust collector did not comply with the allowable range established in the operational restrictions specified above.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16554)
2. All deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16554)

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

PE from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.03 grain per dry standard cubic foot of exhaust from the dust collector.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1) and PTI 02-16554)

1.b Emission Limitation:

PE from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.51 pound per hour from the dust collector.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by the following equation:

$$PE, \text{ in lb/hr} = (0.03 \text{ gr/dscf}) \times (2,000 \text{ cfm}) \times (60 \text{ min/hr}) \times (\text{lb}/7000 \text{ gr})$$

where:

0.03 gr/dscf = the grain loading factor for the dust collectors; and
2,000 cfm = the total exhaust flow rate from the dust collector.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16554)

1.c Emission Limitation:

Visible particulate emissions from the dust collector controlling the mixers shall not exceed 0% opacity as a 6-minute average, except for 1 minute in any 60-minute period.

Applicable Compliance Method:

Compliance shall be demonstrated by performing visible particulate emission observations in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

(Authority for term: OAC rules 3745-17-03(B) and 3745-77-07(C)(1) and PTI 02-16554)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Top Finish mixer (P005)

Activity Description: 55 gallon drum mixer for the manufacture of urethane adhesives and top finish.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
55 gallon drum mixer for the manufacture of top finish	OAC rule 3745-31-05(A)(3) (PTI 02-21973 issued on 5/28/06)	See sections A.I.2.a, A.I.2.b and A.I.2.d below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C)	See sections A.I.2.c and A.II.1 below.

2. Additional Terms and Conditions

- 2.a The volatile organic compounds (VOC) content of the coating mix shall not exceed 0.9 pound per pound of coating.
- 2.b The hourly VOC emissions from coatings shall not exceed 4.5 pounds per hour. The hourly emission limitation is based on the maximum coating mix rate of 250 pounds per hour, as applied, times 0.9 pound VOC per pound coating times 2% factor to account for emissions from mixing as described in AP-42. The hourly VOC emission limitation is based on the emissions unit's potential to emit and thus, no hourly record keeping is required.
- 2.c VOC emissions from material mixed shall not exceed 2.7 tons per rolling, 12-month period.
- 2.d The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.

II. Operational Restrictions

1. Coating mixed in this emissions unit shall not exceed 300,000 pounds per rolling, 12-month period, excluding water and exempt solvents. The permittee has existing production records such that there is no need for first year monthly usage limitations.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following cleanup material information monthly from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, for the purpose of determining the total annual VOC emissions:
 - a. the name and identification number of each cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds VOC per pound of cleanup material;
 - c. the number of pounds of each cleanup material used less the number of pounds of solvent recovered; and
 - d. the total VOC emissions from cleanup material, in pounds per month (sum of [b times c] for each cleanup material).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

2. The permittee shall collect and record the following information monthly:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, in pounds VOC per pound of coating, as mixed (excluding water and exempt solvents);
 - c. the number of pounds of each coating mixed, excluding water and exempt solvents; and
 - d. the rolling, 12-month summation of total coating throughput, in pounds or tons.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

3. The permittee shall collect and record annually the total VOC emissions from all coatings, in tons (the sum of the products resulting from multiplying the VOC content of each material by the usage for that material times 2% emission factor to account for mixing losses, and then dividing by 2000 pounds per ton).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

IV. Reporting Requirements

1. In accordance to the procedure established in the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. any monthly record that indicates the rolling, 12-month summation of coating throughput exceeded the limit specified above.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

3. The permittee shall submit annual reports that specify the total VOC emissions from cleanup materials from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, in tons as a summation of the monthly records for the calendar year divided by 2000 lbs/ton. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1))

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

The VOC content of the coating mix shall not exceed 0.9 pound per pound of coating.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings.

(Authority for term: OAC rules 3745-21-10(B) and 3745-77-07(C)(1) and PTI 02-21973)

1.b Emission Limitation:

The hourly VOC emissions from coatings shall not exceed 4.5 pounds per hour.

Applicable Compliance Method:

The hourly emission limitation is based on the maximum coating mix rate of 250 pounds per hour, as applied, times 0.9 pound VOC per pound coating times 2% factor to account for emissions from mixing as described in AP-42. This emission limit reflects the potential to emit of this line with the VOC content restriction therefore record keeping and reporting are not necessary to verify compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.c Emission Limitation:

VOC emissions from material mixed shall not exceed 2.7 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.2 and A.III.3.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.d Emission Limitation:

The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.

Applicable Compliance Method:

Compliance shall be demonstrated as a summation of the monthly record keeping requirement specified in section A.III.1.d for the calendar year, and then divided by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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55 gallon drum mixer for the manufacture of top finish

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

- Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Adhesive mixer (P006)

Activity Description: 55 gallon drum mixer for the manufacture of PVC adhesives for emissions units K003 and K004 (lines 5 and 8), vented to the 2000 cfm Torit dust collector (#2). Organic emissions are uncontrolled.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
55 gallon drum mixer for the manufacture of adhesives, vented to the 2000 cfm Torit 2 dust collector.	OAC rule 3745-31-05(A)(3) (PTI 02-21973 issued on 5/28/06)	See sections A.I.2.a, A.I.2.b, A.I.2.d, A.I.2.e and A.I.2.f below. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart VVV and OAC rule 3745-31-05(C).
	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
	OAC rule 3745-17-08(B)	The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(C)	See sections A.I.2.c and A.II.4 below.
	40 CFR Part 60, Subpart VVV	See sections A.I.2.g, A.III.5 and A.IV.4 below.

2. Additional Terms and Conditions

- 2.a** The volatile organic compounds (VOC) content of the coating mix shall not exceed 0.03 pound per pound of coating.
- 2.b** The hourly VOC emissions from coatings shall not exceed 0.72 pound per hour. The hourly emission limitation is based on the maximum coating mix rate of 1200 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 2% factor to account for emissions from mixing as described in AP-42. The hourly VOC emission limitation is based on the emissions unit's potential to emit and thus, no hourly record keeping is required.
- 2.c** VOC emissions from material mixed shall not exceed 3.6 tons per rolling, 12-month period from this emissions unit and 3.6 tons per rolling, 12-month period from emissions units P006, P007 and P008, combined.
- 2.d** The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.
- 2.e** Particulate emissions (PE) from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.03 grain per dry standard cubic foot of exhaust and 0.51 pound per hour from the dust collector.
- 2.f** Visible particulate emissions from the dust collector exhaust shall not exceed 0% as a 6-minute average, except for 1 minute during any 60-minute period.
- 2.g** While the total amount of VOC used on coating line K004 and any onsite mix preparation equipment used to prepare coatings (P006, P007 and P008 when mixing for K004) is less than 95 Mg (104.7 tons) per 12-month period, this emissions unit is subject only to the record keeping and reporting requirements of sections A.III.5 and A.IV.4. If the amount of VOC used is 95 Mg or greater in any 12-month period, the affected emissions units shall become subject to all of the requirements of 40 CFR Part 60, Subpart VVV. Once an emissions unit has become subject to the requirements of Subpart VVV, it will remain subject to those requirements regardless of changes in annual VOC use.

II. Operational Restrictions

- 1.** The pressure drop across the dust collector shall be maintained within the manufacturer's recommended range while the emissions unit is in operation, or within the pressure drop range established during the most recent compliance inspection or stack test that determined the emissions unit was in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)
- 2.** The collection efficiency of the air pollution capture hoods for this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at all points of capture. The permittee shall maintain all hoods and enclosures in good operating condition.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)
- 3.** The drum mixer shall be covered and controlled by the fabric filter at all times the mixer is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)

II. Operational Restrictions (continued)

4. Coating mixed in this emissions unit and in emissions unit P006, P007 and P008, combined, shall not exceed 5,957 tons per rolling, 12-month period, excluding water and exempt solvents. The permittee has existing production records such that there is no need for first year monthly usage limitations.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the mixing room dust collector while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee shall record the pressure drop across the dust collector on a weekly basis, when the source is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

2. The permittee shall maintain copies of the record of the weekly pressure drop readings at the facility for a period of at least five years. Those records should be made available for Ohio EPA or their representatives to review during normal working hours.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

3. The permittee shall collect and record the following cleanup material information monthly from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, for the purpose of determining the total annual VOC emissions:

- a. the name and identification number of each cleanup material employed;
- b. the VOC content of each cleanup material, in pounds VOC per pound of cleanup material;
- c. the number of pounds of each cleanup material used less the number of pounds of solvent recovered; and
- d. the total VOC emissions from cleanup material, in pounds per month (sum of [b times c] for each cleanup material).

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

4. The permittee shall collect and record the following information monthly:

- a. the name and identification number of each coating, as applied;
- b. the VOC content of each coating, in pounds VOC per pound of coating, as mixed (excluding water and exempt solvents);
- c. the number of pounds of each coating mixed, excluding water and exempt solvents; and
- d. the rolling, 12-month summation of total coating throughput, in pounds or tons.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements (continued)

5. To comply with 40 CFR Part 60 Subpart VVV, the permittee shall record semiannually:
 - a. an estimate of projected VOC use in emissions unit K004 and the associated mixers (emissions units P006, P007 and P008, when mixing coating for emissions unit K004); and
 - b. the actual 12-month VOC use in emissions unit K004 and the associated mixers (emissions units P006, P007 and P008, when mixing coating for emissions unit K004).

(Authority for term: 40 CFR Part 60, Subpart VVV and PTI 02-21973)
 6. The permittee shall collect and record annually the total VOC emissions from all coatings, in tons (the sum of the products resulting from multiplying the VOC content of each material by the usage for that material times 2% emission factor to account for mixing losses, and then dividing by 2000 pounds per ton).
- (Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

IV. Reporting Requirements

1. In accordance to the procedure established in the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all periods of time during which the pressure drop across the mixing room dust collector did not comply with the allowable range established in the operational restriction specified above; and
 - b. any monthly record that indicates the rolling, 12-month summation of coating throughput exceeded the limit specified above.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)
2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)
3. The permittee shall submit annual reports that specify the total VOC emissions from cleanup materials from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, in tons as a summation of the monthly records for the calendar year divided by 2000 lbs/ton. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1))
4. To comply with Subpart VVV, the permittee shall report:
 - a. the first semiannual estimate in which projected annual VOC use exceeds 95 Mg/yr; and
 - b. the first 12-month period in which the actual VOC use exceeds 95 Mg/yr.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart VVV and PTI 02-21973)

V. Testing Requirements

1. Compliance with the emission limitations in section A.1.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

PE from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.03 grain per dry standard cubic foot of exhaust from the dust collector.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rules 3745-17-03(B) and 3745-77-07(C)(1) and PTI 02-21973)

1.b Emission Limitation:

PE from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.51 pound per hour from the dust collector.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by the following equation:

$$PE, \text{ in lb/hr} = (0.03 \text{ gr/dscf}) \times (2,000 \text{ cfm}) \times (60 \text{ min/hr}) \times (\text{lb}/7000 \text{ gr})$$

where:

0.03 gr/dscf = the grain loading factor for the dust collectors; and
2,000 cfm = the total exhaust flow rate from the dust collector.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.c Emission Limitation:

Visible particulate emissions from the dust collector exhaust shall not exceed 0% as a 6-minute average, except for 1 minute in any 60-minute period.

Applicable Compliance Method:

Compliance shall be demonstrated by performing visible particulate emission observations in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

(Authority for term: OAC rules 3745-17-03(B)) and 3745-77-07(C)(1) and PTI 02-21973)

1.d Emission Limitation:

The VOC content of the coating mix shall not exceed 0.03 pound per pound of coating.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings.

(Authority for term: OAC rules 3745-21-10(B) and 3745-77-07(C)(1) and PTI 02-21973)

V. Testing Requirements (continued)

1.e Emission Limitation:

The hourly VOC emissions from coatings shall not exceed 0.72 pound per hour.

Applicable Compliance Method:

The hourly emission limitation is based on the maximum coating mix rate of 1200 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 2% factor to account for emissions from mixing as described in AP-42. This emission limit reflects the potential to emit of this line with the VOC content restriction therefore record keeping and reporting are not necessary to verify compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.f Emission Limitation:

VOC emissions from material mixed shall not exceed 3.6 tons per rolling, 12-month period from this emissions unit and 3.6 tons per rolling, 12-month period from emissions units P006, P007 and P008, combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.4 and A.III.6.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.g Emission Limitation:

The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.

Applicable Compliance Method:

Compliance shall be demonstrated as a summation of the monthly record keeping requirement specified in section A.III.3.d for the calendar year, and then divided by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
55 gallon drum mixer for the manufacture of adhesives, vented to the 2000 cfm Torit 2 dust collector.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Adhesive mixer (P007)

Activity Description: 55 gallon drum mixer for the manufacture of PVC adhesives for emissions units K003 and K004 (lines 5 and 8), vented to the 2000 cfm Torit dust collector (#2). Organic emissions are uncontrolled.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Mixing Equipment Company, 55 gallon drum mixer for the manufacture of adhesives, vent to a 2000 cfm Torit 2 dust collector.	OAC rule 3745-31-05(A)(3) (PTI 02-21973 issued on 5/28/06)	See sections A.I.2.a, A.I.2.b, A.I.2.d, A.I.2.e and A.I.2.f below. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart VVV and OAC rule 3745-31-05(C).
	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
	OAC rule 3745-17-08(B)	The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(C)	See sections A.I.2.c and A.II.4 below.
	40 CFR Part 60, Subpart VVV	See sections A.I.2.g, A.III.5 and A.IV.4 below.

2. Additional Terms and Conditions

- 2.a** The volatile organic compounds (VOC) content of the coating mix shall not exceed 0.03 pound per pound of coating.
- 2.b** The hourly VOC emissions from coatings shall not exceed 0.72 pound per hour. The hourly emission limitation is based on the maximum coating mix rate of 1200 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 2% factor to account for emissions from mixing as described in AP-42. The hourly VOC emission limitation is based on the emissions unit's potential to emit and thus, no hourly record keeping is required.
- 2.c** VOC emissions from material mixed shall not exceed 3.6 tons per rolling, 12-month period from this emissions unit and 3.6 tons per rolling, 12-month period from emissions units P006, P007 and P008, combined.
- 2.d** The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.
- 2.e** Particulate emissions (PE) from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.03 grain per dry standard cubic foot of exhaust and 0.51 pound per hour from the dust collector.
- 2.f** Visible particulate emissions from the dust collector exhaust shall not exceed 0% as a 6-minute average, except for 1 minute during any 60-minute period.
- 2.g** While the total amount of VOC used on coating line K004 and any onsite mix preparation equipment used to prepare coatings (P006, P007 and P008 when mixing for K004) is less than 95 Mg (104.7 tons) per 12-month period, this emissions unit is subject only to the record keeping and reporting requirements of sections A.III.5 and A.IV.4. If the amount of VOC used is 95 Mg or greater in any 12-month period, the affected emissions units shall become subject to all of the requirements of 40 CFR Part 60, Subpart VVV. Once an emissions unit has become subject to the requirements of Subpart VVV, it will remain subject to those requirements regardless of changes in annual VOC use.

II. Operational Restrictions

- 1.** The pressure drop across the dust collector shall be maintained within the manufacturer's recommended range while the emissions unit is in operation, or within the pressure drop range established during the most recent compliance inspection or stack test that determined the emissions unit was in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)
- 2.** The collection efficiency of the air pollution capture hoods for this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at all points of capture. The permittee shall maintain all hoods and enclosures in good operating condition.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)
- 3.** The drum mixer shall be covered and controlled by the fabric filter at all times the mixer is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)

II. Operational Restrictions (continued)

4. Coating mixed in this emissions unit and in emissions unit P006, P007 and P008, combined, shall not exceed 5,957 tons per rolling, 12-month period, excluding water and exempt solvents. The permittee has existing production records such that there is no need for first year monthly usage limitations.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the mixing room dust collector while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee shall record the pressure drop across the dust collector on a weekly basis, when the source is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

2. The permittee shall maintain copies of the record of the weekly pressure drop readings at the facility for a period of at least five years. Those records should be made available for Ohio EPA or their representatives to review during normal working hours.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

3. The permittee shall collect and record the following cleanup material information monthly from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, for the purpose of determining the total annual VOC emissions:

- a. the name and identification number of each cleanup material employed;
- b. the VOC content of each cleanup material, in pounds VOC per pound of cleanup material;
- c. the number of pounds of each cleanup material used less the number of pounds of solvent recovered; and
- d. the total VOC emissions from cleanup material, in pounds per month (sum of [b times c] for each cleanup material).

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

4. The permittee shall collect and record the following information monthly:

- a. the name and identification number of each coating, as applied;
- b. the VOC content of each coating, in pounds VOC per pound of coating, as mixed (excluding water and exempt solvents);
- c. the number of pounds of each coating mixed, excluding water and exempt solvents; and
- d. the rolling, 12-month summation of total coating throughput, in pounds or tons.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements (continued)

5. To comply with 40 CFR Part 60, Subpart VVV, the permittee shall record semiannually:
 - a. an estimate of projected VOC use in emissions unit K004 and the associated mixers (emissions units P006, P007 and P008, when mixing coating for emissions unit K004); and
 - b. the actual 12-month VOC use in emissions unit K004 and the associated mixers (emissions units P006, P007 and P008, when mixing coating for emissions unit K004).

(Authority for term: 40 CFR Part 60, Subpart VVV and PTI 02-21973)
 6. The permittee shall collect and record annually the total VOC emissions from all coatings, in tons (the sum of the products resulting from multiplying the VOC content of each material by the usage for that material times 2% emission factor to account for mixing losses, and then dividing by 2000 pounds per ton).
- (Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

IV. Reporting Requirements

1. In accordance to the procedure established in the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all periods of time during which the pressure drop across the mixing room dust collector did not comply with the allowable range established in the operational restriction specified above; and
 - b. any monthly record that indicates the rolling, 12-month summation of coating throughput exceeded the limit specified above.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)
2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)
3. The permittee shall submit annual reports that specify the total VOC emissions from cleanup materials from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, in tons as a summation of the monthly records for the calendar year divided by 2000 lbs/ton. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1))
4. To comply with Subpart VVV, the permittee shall report:
 - a. the first semiannual estimate in which projected annual VOC use exceeds 95 Mg/yr; and
 - b. the first 12-month period in which the actual VOC use exceeds 95 Mg/yr.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart VVV and PTI 02-21973)

V. Testing Requirements

1. Compliance with the emission limitations in section A.1.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

PE from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.03 grain per dry standard cubic foot of exhaust from the dust collector.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rules 3745-17-03(B) and 3745-77-07(C)(1) and PTI 02-21973)

1.b Emission Limitation:

PE from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.51 pound per hour from the dust collector.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by the following equation:

$$PE, \text{ in lb/hr} = (0.03 \text{ gr/dscf}) \times (2,000 \text{ cfm}) \times (60 \text{ min/hr}) \times (\text{lb}/7000 \text{ gr})$$

where:

0.03 gr/dscf = the grain loading factor for the dust collectors; and
2,000 cfm = the total exhaust flow rate from the dust collector.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.c Emission Limitation:

Visible particulate emissions from the dust collector exhaust shall not exceed 0% as a 6-minute average, except for 1 minute during any 60-minute period.

Applicable Compliance Method:

Compliance shall be demonstrated by performing visible particulate emission observations in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

(Authority for term: OAC rules 3745-17-03(B) and 3745-77-07(C)(1) and PTI 02-21973)

1.d Emission Limitation:

The VOC content of the coating mix shall not exceed 0.03 pound per pound of coating.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings.

(Authority for term: OAC rules 3745-21-10(B) and 3745-77-07(C)(1) and PTI 02-21973)

V. Testing Requirements (continued)

1.e Emission Limitation:

The hourly VOC emissions from coatings shall not exceed 0.72 pound per hour.

Applicable Compliance Method:

The hourly emission limitation is based on the maximum coating mix rate of 1200 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 2% factor to account for emissions from mixing as described in AP-42. This emission limit reflects the potential to emit of this line with the VOC content restriction therefore record keeping and reporting are not necessary to verify compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.f Emission Limitation:

VOC emissions from material mixed shall not exceed 3.6 tons per rolling, 12-month period from this emissions unit and 3.6 tons per rolling, 12-month period from emissions units P006, P007 and P008, combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.4 and A.III.6.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.g Emission Limitation:

The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.

Applicable Compliance Method:

Compliance shall be demonstrated as a summation of the monthly record keeping requirement specified in section A.III.3.d for the calendar year, and then divided by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Mixing Equipment Company, 55 gallon drum mixer for the manufacture or adhesives, vent to a 2000 cfm Torit 2 dust collector.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Adhesive mixer (P008)

Activity Description: 55 gallon drum mixer for the manufacture of PVC adhesives for emissions units K003 and K004 (lines 5 and 8), vented to the 2000 cfm Torit dust collector (#2). Organic emissions are uncontrolled.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Myers model 7754-15-294, 55 gallon drum mixer for the manufacture of adhesives, vented to a 2000 cfm Torit 2 dust collector.	OAC rule 3745-31-05(A)(3) (PTI 02-21973 issued on 5/28/06)	See sections A.I.2.a, A.I.2.b, A.I.2.d, A.I.2.e and A.I.2.f below. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart VVV and OAC rule 3745-31-05(C).
	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(B)	This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
	OAC rule 3745-17-08(B)	The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(C)	See sections A.I.2.c and A.II.4 below.
	40 CFR Part 60, Subpart VVV	See sections A.I.2.g, A.III.5 and A.IV.4 below.

2. Additional Terms and Conditions

- 2.a** The volatile organic compounds (VOC) content of the coating mix shall not exceed 0.03 pound per pound of coating.
- 2.b** The hourly VOC emissions from coatings shall not exceed 0.72 pound per hour. The hourly emission limitation is based on the maximum coating mix rate of 1200 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 2% factor to account for emissions from mixing as described in AP-42. The hourly VOC emission limitation is based on the emissions unit's potential to emit and thus, no hourly record keeping is required.
- 2.c** VOC emissions from material mixed shall not exceed 3.6 tons per rolling, 12-month period from this emissions unit and 3.6 tons per rolling, 12-month period from emissions units P006, P007 and P008, combined.
- 2.d** The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.
- 2.e** Particulate emissions (PE) from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.03 grain per dry standard cubic foot of exhaust and 0.51 pound per hour from the dust collector.
- 2.f** Visible particulate emissions from the dust collector exhaust shall not exceed 0% as a 6-minute average, except for 1 minute during any 60-minute period.
- 2.g** While the total amount of VOC used on coating line K004 and any onsite mix preparation equipment used to prepare coatings (P006, P007 and P008 when mixing for K004) is less than 95 Mg (104.7 tons) per 12-month period, this emissions unit is subject only to the record keeping and reporting requirements of sections A.III.5 and A.IV.4. If the amount of VOC used is 95 Mg or greater in any 12-month period, the affected emissions units shall become subject to all of the requirements of 40 CFR Part 60, Subpart VVV. Once an emissions unit has become subject to the requirements of Subpart VVV, it will remain subject to those requirements regardless of changes in annual VOC use.

II. Operational Restrictions

- 1.** The pressure drop across the dust collector shall be maintained within the manufacturer's recommended range while the emissions unit is in operation, or within the pressure drop range established during the most recent compliance inspection or stack test that determined the emissions unit was in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)
- 2.** The collection efficiency of the air pollution capture hoods for this emissions unit shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at all points of capture. The permittee shall maintain all hoods and enclosures in good operating condition.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)
- 3.** The drum mixer shall be covered and controlled by the fabric filter at all times the mixer is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)

II. Operational Restrictions (continued)

4. Coating mixed in this emissions unit and in emissions unit P006, P007 and P008, combined, shall not exceed 5,957 tons per rolling, 12-month period, excluding water and exempt solvents. The permittee has existing production records such that there is no need for first year monthly usage limitations.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the mixing room dust collector while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee shall record the pressure drop across the dust collector on a weekly basis, when the source is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

2. The permittee shall maintain copies of the record of the weekly pressure drop readings at the facility for a period of at least five years. Those records should be made available for Ohio EPA or their representatives to review during normal working hours.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

3. The permittee shall collect and record the following cleanup material information monthly from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, for the purpose of determining the total annual VOC emissions:

- a. the name and identification number of each cleanup material employed;
- b. the VOC content of each cleanup material, in pounds VOC per pound of cleanup material;
- c. the number of pounds of each cleanup material used less the number of pounds of solvent recovered; and
- d. the total VOC emissions from cleanup material, in pounds per month (sum of [b times c] for each cleanup material).

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

4. The permittee shall collect and record the following information monthly:

- a. the name and identification number of each coating, as applied;
- b. the VOC content of each coating, in pounds VOC per pound of coating, as mixed (excluding water and exempt solvents);
- c. the number of pounds of each coating mixed, excluding water and exempt solvents; and
- d. the rolling, 12-month summation of total coating throughput, in pounds or tons.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

III. Monitoring and/or Record Keeping Requirements (continued)

5. To comply with 40 CFR Part 60 Subpart VVV, the permittee shall record semiannually:
 - a. an estimate of projected VOC use in emissions unit K004 and the associated mixers (emissions units P006, P007 and P008, when mixing coating for emissions unit K004); and
 - b. the actual 12-month VOC use in emissions unit K004 and the associated mixers (emissions units P006, P007 and P008, when mixing coating for emissions unit K004).

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart VVV and PTI 02-21973)

6. The permittee shall collect and record annually the total VOC emissions from all coatings, in tons (the sum of the products resulting from multiplying the VOC content of each material by the usage for that material times 2% emission factor to account for mixing losses, and then dividing by 2000 pounds per ton).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

IV. Reporting Requirements

1. In accordance to the procedure established in the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all periods of time during which the pressure drop across the mixing room dust collector did not comply with the allowable range established in the operational restriction specified above; and
 - b. any monthly record that indicates the rolling, 12-month summation of coating throughput exceeded the limit specified above.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

3. The permittee shall submit annual reports that specify the total VOC emissions from cleanup materials from emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined, in tons as a summation of the monthly records for the calendar year divided by 2000 lbs/ton. These reports shall be submitted by January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1))

4. To comply with Subpart VVV, the permittee shall report:
 - a. the first semiannual estimate in which projected annual VOC use exceeds 95 Mg/yr; and
 - b. the first 12-month period in which the actual VOC use exceeds 95 Mg/yr.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart VVV and PTI 02-21973)

V. Testing Requirements

1. Compliance with the emission limitations in section A.1.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

PE from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.03 grain per dry standard cubic foot of exhaust from the dust collector.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

(Authority for term: OAC rules 3745-17-03(B) and 3745-77-07(C)(1) and PTI 02-21973)

1.b Emission Limitation:

PE from emissions units P002, P003, P004, P006, P007 and P008, combined, shall not exceed 0.51 pound per hour from the dust collector.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by the following equation:

$$PE, \text{ in lb/hr} = (0.03 \text{ gr/dscf}) \times (2,000 \text{ cfm}) \times (60 \text{ min/hr}) \times (\text{lb}/7000 \text{ gr})$$

where:

0.03 gr/dscf = the grain loading factor for the dust collectors; and
2,000 cfm = the total exhaust flow rate from the dust collector.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.c Emission Limitation:

Visible particulate emissions from the dust collector exhaust shall not exceed 0% as a 6-minute average, except for 1 minute during any 60-minute period.

Applicable Compliance Method:

Compliance shall be demonstrated by performing visible particulate emission observations in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

(Authority for term: OAC rules 3745-17-03(B)) and 3745-77-07(C)(1) and PTI 02-21973)

1.d Emission Limitation:

The VOC content of the coating mix shall not exceed 0.03 pound per pound of coating.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the organic compound content of the coatings.

(Authority for term: OAC rules 3745-21-10(B) and 3745-77-07(C)(1) and PTI 02-21973)

V. Testing Requirements (continued)

1.e Emission Limitation:

The hourly VOC emissions from coatings shall not exceed 0.72 pound per hour.

Applicable Compliance Method:

The hourly emission limitation is based on the maximum coating mix rate of 1200 pounds per hour, as applied, times 0.03 pound VOC per pound coating times 2% factor to account for emissions from mixing as described in AP-42. This emission limit reflects the potential to emit of this line with the VOC content restriction therefore record keeping and reporting are not necessary to verify compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.f Emission Limitation:

VOC emissions from material mixed shall not exceed 3.6 tons per rolling, 12-month period from this emissions unit and 3.6 tons per rolling, 12-month period from emissions units P006, P007 and P008, combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.4 and A.III.6.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

1.g Emission Limitation:

The VOC emissions from all cleanup materials shall not exceed 6.0 tons per year for emissions units K001, K002, K003, K004, K005, P002, P003, P005, P006, P007 and P008, combined.

Applicable Compliance Method:

Compliance shall be demonstrated as a summation of the monthly record keeping requirement specified in section A.III.3.d for the calendar year, and then divided by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Myers model 7754-15-294, 55 gallon drum mixer for the manufacture of adhesives, vented to a 2000 cfm Torit 2 dust collector.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21973)

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