

Facility ID: 1677010999 Issuance type: Final State Permit To Operate

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

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

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

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Facility ID: 1677010999 Emissions Unit ID: P042 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Anti-oxidant coating line for impregnating carbon disks, consists of a dip tank, drain vessel, and an electric baking oven.	OAC rule 3745-31-05 PTI # 16-1852	0.8 lbs./hr. phosphoric acid 2.5 tons/yr. phosphoric acid 5.0 lbs./hr. acetic acid 7.5 tons/yr. acetic acid 5.0 lbs./hr. organic compounds 7.5 tons/yr. organic compounds
	OAC rule 3745-21-07(G)(9)	See 2.a below.

2. **Additional Terms and Conditions**
 - (a) less stringent than the requirements of OAC rule 3745-31-05 and BAT.

B. Operational Restrictions

1. The permittee shall not employ photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - (a) The company identification for each coating and cleanup material employed.
 - (b) The number of gallons of each coating and cleanup material employed.
 - (c) The organic compound and phosphoric and acetic acid content of each coating and cleanup material, in pounds per gallon, and whether the material was photochemically reactive or not.
 - (d) The total organic compound, phosphoric, and acetic acid emission rates for all coatings and cleanup materials, in pounds per day.
 - (e) The total number of hours the emissions unit was in operation.
 - (f) The average hourly organic compound, phosphoric acid and acetic acid emission rates for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
2. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and

c. where computer modeling is preformed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - (a) An identification of each day during which the average hourly total organic compound emissions exceeded 5.0 pounds per hour, and the actual average hourly organic compound emissions for each such day.
2. The permittee shall submit deviation reports which include an identification of each day during which photochemically reactive materials were employed and the actual organic compound emission rate for each such day.
The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous year. These reports shall be submitted by February 15 of each year.
The permittee shall submit reports in the following manner:
 - a. reports of any required monitoring , and/or record keeping shall be subitted to the Akron Regional Air Quality Management Distrct; and,
 - b. reports of any devaitions (excursions) from emissions limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit (a) dates, (b) the probable cause of such deviations and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to Akron Regional Air Quality Management District. These reports shall be submitted within thirty days of the reccord, report or calculation indicating the devation had taken place.

None None

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I shall be determined in accordance with the following methods:
Emission Limitation:

phosphoric Acid emissions 0.8 pounds per hour and 2.5 tons per year

Applicable Compliance Method:

daily record shall be maintained which document the phosphoric acid content of each coating and clean up material employed, and the calculated average hourly emission rate for all coatings and clean up materials employed in this emissins unit. Formulation data shall be used to determine the phosphoric acid content of each coating and clean up solvent.
Emission Limitation:

Acetic Acid emissions 5.0 pounds per hour and 7.5 tons per year

Applicable Compliance Method:

daily record shall be maintained which document the acetic acid content of each coating and clean up material employed, and the calculated average hourly emission rate for all coatings and clean up materials employed in this emissins unit. Formulation data shall be used to determine the acetic acid content of each coating and clean up solvent.
Emission Limitation:

organic compound emissions: 5.0 pounds per hour and 7.5 tons per year

Applicable Compliance Method:

daily record shall be maintained which document the organic material content of each coating and clean up material employed, and the calculated average hourly emission rate for all coatings and clean up materials employed in this emissins unit. Formulation data shall be used to determine the organic material content of each coating and clean up solvent.
Operational Restriction:

No photochemically reactive materials

Applicable Compliance Method:

daily record shall be maintained which document the volatile portion of each coating and cleanup solvent employed, and whether they are photochemically reactive or not. Formulation data shall be used to determine the acetic acid content of each coating and clean up solvent.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The

following summarizes the results of the modeling for the "worse case" pollutant(s):

Pollutant: Acetic Acid

TLV (ug/m3): 25

Maximum Hourly Emission Rate (lbs/hr): 5.0

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 233.5

MAGLC (ug/m3): 595.0

Pollutant: Phosphoric Acid

TLV (ug/m3): 1

Maximum Hourly Emission Rate (lbs/hr): 0.8

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 23.44

MAGLC (ug/m3): 23.81

Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
11 ft. carbon processing furnace with a thermal incinerator	OAC Rule 3745-31-05 PTI 16-1890	2.47 lbs/hr and 10.82 tons per year of organic material. See A.2.a. below.
	OAC Rule 3745-21-07(J)(2)	Less stringent than the BAT requirements established under OAC Rule 3745-31-05 and PTI 16-1841.
2. Additional Terms and Conditions		
(a) This emissions unit shall be controlled with a thermal incinerator with at least a 99 percent control efficiency.		
B. Operational Restrictions		
1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time, shall be equal to or greater than 1750 degrees Fahrenheit.		
C. Monitoring and/or Record Keeping Requirements		
1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within + 1 percent of the temperature being measured or + 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.		
2. The permittee shall collect and record the following information each day: <ul style="list-style-type: none"> a. The average temperature of the exhaust gases from the thermal incinerator during each of the eight 3-hour blocks of time during the day. b. A log or record of downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit is in operation. 		
D. Reporting Requirements		
1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1750 degrees Fahrenheit.		
2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.		
3. The deviation reports shall be submitted in accordance with the requirements specified in The General Terms and Conditions.		
E. Testing Requirements		
1. Compliance with the emission limitations in Section A.I shall be determined in accordance with the following methods: Emission Limitations: 2.47 pounds per hour organic materials 99 percent control efficiency Applicable Compliance Methods: The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements: <ul style="list-style-type: none"> a. The emission testing shall be conducted within 6 months of the expiration of this permit, and prior to the submission of the renewal application. b. The emission testing shall be conducted to demonstrate compliance with the hourly organic material emission limitation and the control efficiency limitation for organic compounds. c. The following test method(s) shall be employed to demonstrate compliance with the overall control efficiency limitation: Method 25 of 40 CFR Part 60, Appendix A. d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. 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 OAC rule 3745-21-10. 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. Emission Limitation: 10.8 tpy of organic materials. Applicable Compliance Method:		

Compliance with the emission limitation can be assumed provided that the permittee complies with the hourly emission limitation.

F. **Miscellaneous Requirements**

1. None