

Facility ID: 1677140014 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.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677140014 Emissions Unit ID: P001 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>
Superimide laboratory (22 hour long batch operation)	OAC rule 3745-31-05 (PTI 16-1713)	See A.2.a and A.2.b below.
	OAC rule 3745-21-07	See A.2.a below.

### 2. Additional Terms and Conditions

- (a) Emissions unit P001 is not covered under any control technology guideline (CTG) and includes evaporation of a liquid organic material which is not a photochemically reactive material, as defined in Ohio Administrative Code (OAC) 3745-21-01(C)(5). Methanol is the only liquid organic material used in this process, including cleanup, and methanol emissions, due to cleanup, are assumed negligible. Therefore, this emissions unit will be regulated under OAC rule 3745-21-07, but is not subject to the emission limitations specified in OAC rule 3745-21-07(G)(1) or (G)(2). Emissions unit P001 is a batch process and, due to the inherent physical limitations of the reactor, each batch takes a total of 22 hours of reaction/drying/cleanup time and can use a maximum batch-weight of 25 pounds of methanol, all of which is evaporated. Based on application data, this emissions unit has the potential to emit (PTE) 4.98 tons per year (TPY) of methanol, but the company states that the proposed maximum annual emissions of methanol, at this facility, will always be under 1.0 TPY. Therefore, the emissions of methanol from this emissions unit shall not exceed 6.25 lbs/hr and 0.99 TPY, based upon a rolling, 12-month summation of the monthly emissions.

### B. Operational Restrictions

1. The permittee shall not employ liquid organic materials that are considered photochemically reactive materials per OAC rule 3745-21-01(C)(5) in the emissions unit or any activity associated with the emissions unit, including cleanup.

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each calendar month to determine methanol emissions from emissions unit P001:
  - a. the identification and date of each Superimide batch processed;
  - b. the metered amount of methanol, in lbs/batch, employed in each batch, excluding methanol used for cleanup, which is reclaimed for recycling (the permittee has the ability to precisely measure the batch-weight of methanol in each Superimide batch processed);
  - c. the maximum average hourly methanol emissions, in lbs/hr, for each Superimide batch (this maximum value typically occurs only during the normal 3-hour vent-hood portion of drying when an assumed 75% of the total batch-weight of methanol evaporates);
  - d. the monthly methanol emissions, in lbs/month (this is the total methanol employed in all Superimide batches processed each calendar month, excluding reclaimed cleanup methanol).

### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify each Superimide batch during which the maximum average hourly methanol emissions exceeded the maximum allowable average hourly methanol emission rate of 6.25 lbs/hr.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for methanol.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.2.b of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
6.25 lbs/hr of methanol  
  
Applicable Compliance Method:  
  
Compliance with the above limitation shall be demonstrated by the appropriate record keeping in Section C.1.  
Emission Limitation:  
  
0.99 TPY of methanol, based upon a rolling, 12-month summation of the monthly emissions  
  
Applicable Compliance Method:  
  
Compliance with the above limitation shall be demonstrated by summing the monthly methanol emissions, as calculated by the appropriate record keeping in Section C.1.

**F. Miscellaneous Requirements**

1. The permittee shall comply with any applicable State and federal requirements governing the storage, treatment, transport, and disposal of any waste material generated by the operation of the sources.
2. The permittee is hereby notified that this permit and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
3. This permit allows the use of the liquid organic material (i.e., methanol in this case) specified by the permittee in the application. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency is required, including the possible issuance of modifications to the permit to install and the operating permit:
  - a. any change in the liquid organic material employed in the process or cleanup; and
  - b. any change to the emissions unit or its method of operation that would either 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.