

Facility ID: 0228000285 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: 0228000285 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>
P001 - Chemical blending process line 1, including compounding weight station, mixing, and packaging operation, with a 12,000 cfm baghouse control.	OAC rule 3745-17-07 (B)(1)	Visible particulate emissions from this emissions unit shall not exceed twenty percent (20%) opacity as a 3-minute average.
	OAC rule 3745-17-08 (B)	See section B.1 of these terms and conditions.
	OAC rule 3745-17-11 (B)(1)	Particulate emissions from this emissions unit shall not exceed 1.11 pounds per hour.
	OAC rule 3745-21-07 (G)(2)	Exempt.
	OAC rule 3745-31-05 (A)(3) PTI No. 02-15686m1	See section A.2.a of these terms and conditions. Visible particulate emissions shall not exceed five percent (5%) opacity as a 6-minute average from stack associate with this emissions unit.
		Particulate emissions from this emissions unit shall not exceed 4.86 tons per year.
		Organic Compound (OC) emissions from this emissions unit shall not exceed 1.29 pounds per hour and 5.65 tons per year.
OAC rule 3745-17-07 (A)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 (B)(1), OAC rule 3745-17-08 (B), and OAC rule 3745-17-11 (B)(1). The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).	

**2. Additional Terms and Conditions**

- (a) This emissions unit shall not employ organic liquids which are photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5).

**B. Operational Restrictions**

1. The permittee shall not operate this emissions unit without taking or installing reasonably available control measures to prevent fugitive dust from becoming airborne. Such reasonably available control measures shall include, but not be limited to the following which are appropriate to minimize or eliminate visible particulate emissions of fugitive dust:
  - a. The installation and use of hoods, fans, and a baghouse to adequately enclose, contain, capture, vent and control the fugitive dust. The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the points of capture to the extent possible with good engineering design; and
  - b. The pressure drop across the baghouse shall be maintained within the range of 4 to 5 inches of water while

the emissions unit is in operation.

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

1. The permittee shall keep the following records on all materials used in this emissions unit:
  - a. The identification of the chemical compound and its physical state.
  - b. For any liquid organic materials, whether or not the material is a photochemically reactive material, as defined in OAC rule 3745-21-01 (C)(5).
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse 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 baghouse on weekly basis.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information for this emissions unit:
  - a. An identification of each day during which any photochemically reactive materials were employed, and the actual amount, in pounds per day, of photochemically reactive materials employed.
  - b. An identification of each week during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1.b of these terms and condition.
2. All deviation (excursion) reports shall be submitted in accordance with Section 3.b of the General Terms and Conditions.

**E. Testing Requirements**

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

- a. Emission Limitation:  
1.29 pounds per hour of OC

Applicable Compliance Method:  
Compliance shall be determined based upon the following:

$$(OC)H = (MHPR)(EFc)$$

where,

(OC)H = Hourly OC emissions rate, in pounds per hour;  
MHPR = Maximum Hourly Production Rate = 6,000 pounds per hour; and  
(EFc) =  $2.15 \times 10^{-4}$  lb/lb rubber of OC emissions. The worst case OC emission factor from AP - 42, section 4.12 Manufacture of Rubber Products, Table 4.12-4;

- b. Emission Limitation:  
1.11 pounds per hour of particulate

Applicable Compliance Method:  
Compliance shall be determined based upon the following:

$$(PE)H = (MHPR)(EFp)(1 - CaE) + (MHPR)(EFp)(CaE)(1 - CoE)$$

where,

(PE)H = Hourly particulate emission rate, in pounds per hour;  
MHPR = Maximum Hourly Production Rate = 6,000 pounds per hour;  
EFp =  $9.25 \times 10^{-4}$  lb/lb rubber of particulate emissions. The worst case PE emission factor from AP - 42, section 4.12 Manufacture of Rubber Products, Table 4.12-4;  
CaE = Capture efficiency of the control system. Assume CaE = 98%; and  
CoE = Control efficiency of the baghouse. From manufacture, the minimum control efficiency = 99.5%

- c. Emission Limitation:  
20% opacity as a 3-minute average

Applicable Compliance Method:  
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(3) using the test methods and procedures specified in U.S. EPA Reference Method 9.

- d. Emission Limitation:  
4.86 tons per year of particulate  
5.65 tons per year of OC

Applicable Compliance Method:  
The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emission Limitation:  
5% opacity from stack as a 6-minute average

Applicable Compliance Method:  
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1) using the test methods and procedures specified in U.S. EPA Reference Method 9.

**F. 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.